

**c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.**

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

**1. Federal, State, and local agencies and programs;**

The Rhode Island Office of Rehabilitation Services (ORS) collaborates with programs and agencies providing services that will assist an individual with a disability to establish and reach an employment goal. Types of agencies that ORS collaborates with include: hospitals, medical and disability support organizations, educational institutions (both public and private), professional associations, domestic violence and homeless shelters, community centers, community mental health agencies, local educational authorities, substance abuse treatment facilities, private medical offices, state agencies, federal agencies, community employers, private businesses, and advocacy groups.

Memorandums of Understanding (MOU)/Cooperative Agreements (CA) have been negotiated with Department of Veterans Affairs (VA), Institutions of Higher Education (IHE - Rhode Island College, University of Rhode Island and Community College of Rhode Island), Rhode Island Department of Labor and Training (DLT), Mashantucket Pequot Tribal Nation, Workforce Partnership of Greater Rhode Island, Cranston/Providence Workforce Development, and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) expired in September 2015, but both agencies have agreed to an extension of the CA which remains in effect. A new MOU for 2019 and beyond is in the process of development.

In order to enhance the recruitment of qualified rehabilitation counselors, ORS has a Memorandum of Understanding with Assumption College and Salve Regina University to provide practicum and internship opportunities to graduate level Rehabilitation Counseling students.

ORS has cultivated a strong working relationship with the State's independent living center to augment the services provided by ORS. RI has one IL center that provides support services, mobility and transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services to adults, out-of-school and in-school youth.

**2. State programs carried out under section 4 of the Assistive Technology Act of 1998;**

ORS continues to be the lead and implementing agency for the State Grants for Assistive Technology. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living (OSCIL), TechACCESS of RI, and East Bay Educational Collaborative to provide performance-measured services including device

loans, demonstrations, device re-utilization, public awareness, and information and assistance.

ORS also operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program, that is included in the ATAP partnership. Based on ATAP's strong collaboration, ORS utilizes ATAP services for ORS clients who need access to the above services for resources, vocational assessments, and job retention, as well as making sure an individual is able to utilize technology recommended to them to increase their vocational and independent living potential.

ATAP, in conjunction with the ATAP Partners and State Independent Living Center (OSCIL), provides training to ORS Vocational Rehabilitation Counselors about assistive technology and the services of the program. The ATAP Partners also participate in the Assistive Technology Conference of New England, which is held each Fall.

### **3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;**

ORS does not have such cooperative agreements at this time.

### **4. Noneducational agencies serving out-of-school youth; and**

ORS has cultivated a strong working relationship with the one RI independent living center Ocean State Center for Independent Living (OSCIL) to augment vocational rehabilitation services. OSCIL center has the ability to provide support services, mobility and transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services. The IL center is exploring how to expand services to transition-aged populations: out-of-school and in-school youth. ORS also participates with the DLT Youth Centers in reviewing their requests for proposals for Youth Center Summer Work programs. In addition, the Office of Rehabilitation Services and one of the Youth Centers, has a project of jointly working with the youth in the South County area. Both Workforce Investment Boards of RI also have youth subcommittees of which ORS is a participant though the subcommittees have not met this year. ORS has begun expansion with the two Governor's Workforce Boards and RealJobsRI to expand Pre-Employment Transition services to students with disabilities. This has also initiated work with the Westerly Education Center on employment-specific job exploration programming that should lead to skilled job opportunities.

### **5. State use contracting programs.**

The Vocational Rehabilitation program relies primarily on a fee-for-service model to purchase/obtain goods and services for clients. Goods and services are authorized according to the client's Individualized Plan for Employment (IPE).

Vendors authorized to provide services are approved by ORS via an application process and review by RI Accounts and Control, plus a federal Systems for Award Management (SAM), and Secretary of State check at application, and are reviewed annually thereafter.

RI no longer utilizes contracts for service provision, and those that had been established to assist educational collaboratives to move from long-term contracts with ORS to build

their capacity to provide more comprehensive services such as assessment, community-based work experiences, and summer work to youth ended in 2016. The educational collaboratives are now reliant on a fee-for-service model, as are all other ORS Community Rehabilitation Programs (CRPs).

In addition, ORS is the lead and implementing agency for the Assistive Technology Access Partnership (ATAP) program. The program is structured into contracts with deliverables, such as information and assistance, public awareness, device loans, device demonstrations, and device reutilizations.

In November 2017, the VR program finalized a contract with the Sherlock Center of Rhode Island College to build Rhode Island's capacity of Certified Benefits Counselors for individuals receiving SSI and/or SSDI. The Sherlock Center was granted the Work Incentive Planning and Assistance Grant by SSA to administer the WIPA program. Any work with the Sherlock Center is now through a fee-for-service arrangement.

## **d. Coordination with Education Officials**

Describe:

### **1. DSU's plans**

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

ORS has several formal agreements with Education Officials: (1) RI Department of Education (RIDE), and (2) RI Institutions of Higher Education.

### **I. COOPERATIVE AGREEMENT WITH RHODE ISLAND DEPARTMENT OF EDUCATION (RIDE)**

- **INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:**

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. The current CA between ORS and RIDE expired September, 2015, but both agencies have agreed to an extension of the CA which remains in effect. An updated MOU has been completed and signed, and copies were disseminated to both agencies in November 2019. During the recent site visit by the Rehabilitation Services Administration, there was advisory to ensure that the new MOU be revised to meet the federal standards, and RIDE and ORS have agreed to amend the new MOU to reflect those advisories.

The plans and procedures for coordination with RIDE and ORS, an RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for almost twenty years. The formal agreement between ORS and RIDE describes interagency collaboration and coordination, explains the roles and responsibilities of each partner, and the process for resolving disagreements. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services. This collaboration has enabled ORS to have a MA level Rehabilitation Counselor at each high school to provide an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services and consultation in addition to WIOA Pre-Employment Transition Services (Pre-ETS.)

Two Memorandum of Understanding (MOU) are in place for RIDE, ORS, and the state Developmental Disability agency - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). One MOU defines the working relationship between the three parties, and the other MOU addresses data sharing for the state agencies. The Department of Justice (DOJ)/State Consent Decree required that each of these MOUs be developed

and implemented to ensure that the responsibility for services and implementation of Employment First principles occurs within RI in a manner consistent with the mandates of the DOJ/State Consent Decree. In-school youth with significant intellectual disabilities are entitled to access to an array of transition planning, career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed.

- VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

The CA between ORS and RIDE provides the foundation for ORS Vocational Rehabilitation Counselors' presence within each public high school in the state.

The referral to ORS from the Local Education Authority (LEA), with parental/guardian consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This initial meeting creates the foundation for ORS Transition and Pre-ETS and includes the process for informed choice for student/family to register just for Pre-ETS services or apply for the full array of VR services. Under the auspices of the Cooperative Agreement, ORS is able to assist in-school youth with disabilities in collaboration with each LEA. These transition services and Pre-Employment Services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to prepare students for employment after high school. However, due to State fiscal concerns and budgetary matters, ORS has had to implement a more restrictive OOS, as of 12/19/2017; and as a result, a Wait List for services has been implemented. This has impacted Pre-ETS service delivery. Counselors meet with potentially eligible students with disabilities and their parents/guardians to give them informed choice options as described above. Still, the Office of Rehabilitation Services strives and is committed to assist all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. Inherent in the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible Category I for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility (Status 10) after coming off the Wait List, and updated as appropriate, and again prior to graduation.

The IPE establishes an employment goal and the associated steps/services needed to reach that goal. The IPE goal for in-school youth is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-ETS provided to in-school youth may include Counseling and Guidance, Vocational Evaluations/Exploration and Assessments, Community-Based Work Experiences, Tri-Employment Program, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training. Other Pre-ETS services are being explored, including job exploration services

to middle-school aged students with disabilities that began as a pilot with 10 LEAs with hopes to expand State-wide in 2019-2020.

The DOJ/State Consent Decree has additional expectations of ORS services for in-school youth with significant intellectual disabilities (I/DD). DOJ expects all students with I/DD to have an opportunity to experience 120 days of trial work experiences prior to exit from public education. Therefore, ORS services incorporate a review of the Career Development Plan (CDP) with the Transition team of any community/work experiences that have already occurred. The team, including the student and family, determine the additional school/home/ community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include ORS-supported services. This information will assist the Transition team to achieve the two 60-day Trial Work Experiences mandate of the DOJ/State Consent Decree.

The student and his/her family's involvement with ORS will support the student's transition from high school to adult services/employment. The relationship established between the student, family, and Vocational Rehabilitation Counselor is already in place upon graduation.

## **II. COOPERATIVE AGREEMENT (CA) WITH INSTITUTIONS OF HIGHER EDUCATION**

In support of ORS customers attending state colleges, ORS has a Cooperative Agreement (CA) with the three state institutions of higher education: Community College of Rhode Island (CCRI), Rhode Island College (RIC), and the University of Rhode Island (URI). The MOU clarifies the role of each partner in fostering a seamless delivery system intended to support ORS customers attending post-secondary programs. It also defines the financial parameters for each partner in a cost-sharing formula for support services, accommodations, and assistive technology for post-secondary students with an active Individualized Plan for Employment (IPE) with ORS.

### **2. Information on the formal interagency agreement with the State educational agency with respect to:**

#### **A. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;**

RIDE has contracts with the Regional Educational Collaboratives to support transition, planning, and information about adult services within each high school. Each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Transition Coordinator (RTC), and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. ORS Counselors provide and share information regarding adult services; typically, the ORS Counselor at each high school provides specific information regarding ORS services. The RTC supports the sharing and dissemination of ORS information. This "Introduction to State Services" is to inform school staff about services and eligibility for programs and includes employment/supported employment programming that may be available, as well as



services from the State's Department of Developmental Disabilities as appropriate. This Orientation meeting serves as an opportunity to reinforce the referral process to ORS (including information about potential Wait List).

In addition to the school-based interventions and consultation with the LEA, ORS is involved in each region's Transition Advisory Committee (TAC), the statewide Transition Council, and a myriad of other system development efforts to enhance work experiences and transition for in-school youth with disabilities, regardless of IEP/504 status.

Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection/Wait List, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, CDPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

**B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;**

ORS and each Local Education Authority (LEA) collaborate to meet the transition needs of youth with significant disabilities. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection/Waitlist, and accept referrals.

The ORS Transition and Pre-Employment Transition Services provided to in-school youth may include Counseling & Guidance, Job Exploration and Assessments, Community-Based Work Experiences, Tri-Employment Program, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects, and travel training. The results of these interventions are shared with the student, families, and school personnel so that planning and academic programming in school is influenced by the findings and needs identified through ORS transition services. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any career exploration, internships, or volunteer activities completed by the LEA provide valuable vocationally relevant information to the discussion and planning process. These activities are considered work experiences, and so are important to consider as ORS and the LEA plans next steps and post high school objectives and needs.

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD or those who may be eligible for adult services (many youth who qualify for DD do not have a primary disability of I/DD, i.e., Autism, Cerebral Palsy, etc.) beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team

meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience two 60-day trial work experiences prior to graduation. Therefore, ORS services incorporate a review with the CDP team (Student, family, LEA, BHDDH & ORS representation) of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community-Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work experiences. This information will assist the team and the Vocational Rehabilitation Counselor in achieving the two 60-day Trial Work Experience mandate of the DOJ/State Consent Decree.

**C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;**

ORS functions as a referral source, technical assistance, and consultation partner to the LEAs. RIDE oversees 36 different state Local Education Authority (LEA) responsibilities for oversight over IDEA. RIDE conducts periodic IDEA monitoring visits with each LEA. ORS counselors may sign up to be part of the RIDE school support visits.

Rhode Island Department of Education (RIDE) and ORS, in collaboration with Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), utilize and follow the Transition Timeline, which spells out each agency's roles and responsibilities (and at what age) for all transition-age youth and students with disabilities. It also lays out processes and services to be available at each juncture in transition. The Cooperative Agreement between ORS and RIDE does not entail any financial interchange or responsibilities. ORS is the lead agency in this CA.

**D. procedures for outreach to and identification of students with disabilities who need transition services.**

The LEA identifies students with disabilities who may be eligible for transition services with ORS and facilitates a formal referral to the agency with parental approval. The LEA provides education records as part of the referral packet to ORS. Upon receipt of the referral packet, approved by the parents, the ORS Vocational Rehabilitation Counselor schedules a meeting with the student and family to explain the program, become familiar with the student, and plan next steps. The Vocational Rehabilitation Counselor will explain Pre-ETS services, Order of Selection/Wait List, and provide informed choice options, including whether to register for Pre-ETS services or apply for VR services. . Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility Category I.

At times, school personnel may request Vocational Rehabilitation Counselor presence at an IEP meeting prior to a formal referral to ORS. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.



**e. Cooperative Agreements with Private Nonprofit Organizations**

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. ORS relies on a fee-for-service outcome-based fee structure with a network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of its customers. The ORS Fee-for-Service structure provides a means of evaluating and monitoring the quality of deliverables as agency-generated authorizations to the CRP/vendor, reports, outcomes, and client satisfaction are variables involved in payment for client services.

A prospective Community Rehabilitation Provider (CRP) or vendor completes an application, is vetted through the state Department of Accounts and Control, the federal System for Award Management (SAM) web-site, and the Secretary of State prior to approval by ORS. CRPs/vendors requesting approval to provide services on fee-for-service basis will be evaluated based on ORS's need for that service/training. ORS examines the geographic, population specific, labor market, and /or training content need of the agency based on CNA, and/or client feedback. Based on these findings, in addition to the results of the core partner strategic planning sessions, ORS identifies service/training expansion needs and may approve a new service/training vendor (after completing the vetting process) on a trial basis or not approve the service/training. Pilot programs are often used with new or existing vendors, and provide an opportunity to develop, monitor and evaluate if a service delivery model (designed to meet the rehabilitation needs of a specific disability group) is effective prior to committing long term to the service. A pilot offers the opportunity to make appropriate changes to ensure a positive outcome from a new initiative.

The DOJ/State Consent Decree has added additional requirements to the approval process of CRPs who are working with youth and adults with I/DD:

- CRP staff must meet certain baseline credentialing criteria to provide Job Coaching and Job Development services to customers with significant intellectual disabilities; and,
- CRPs providing Supported Employment Services must participate in a Continuous Quality Improvement review periodically.

## **f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services**

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two (Behavioral Health (BH) and Developmental Disabilities (DD)) Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to in-school youth and obligates ORS to set aside 50% of SE grant (when available) for youth with significant disabilities age 14-24. ORS will be exploring how to integrate these SE services into the existing transition service delivery system.

ORS will continue to partner with Community Rehabilitation Providers (CRPs) of supported employment services so that customers can make informed choices about integrated competitive employment options through real work experiences. ORS sponsors and provides ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, and core values has occurred with staff of ORS and with CRPs to increase participation in provision of the ORS Supported Employment program. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs to provide the extended supports that sustain employment for individuals with significant disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each supported employment service. The IPE also identifies the CRP accepting responsibility to provide long term and intermittent support services to the individual with a disability. This shift in service delivery responsibility is well coordinated by the ORS counselor and CRP/long-term support provider so that there will be seamless access to the supports needed to sustain employment.

The time frame for transitioning an individual from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. Although RSA has established SE caps of 24 months for adults and 48 months for youth with disabilities, ORS will be working with CRPs who provide Supported Employment Services to improve the quality and availability of employment-related services.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS through the BH and DD SE Councils with BHDDH representation, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also

encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its' supported employment population.

In 2014, the State of RI negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment Services in order to work. The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop, enhance and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. The CD obligates ORS to (1) ensure in-school youth with I/DD engage in a 120-day Trial Work Experience prior to leaving high school, (2) CRP personnel providing Supported Employment job coaching and job placement services to meet certain criteria/credentials to provide services, and (3) establishment of a Continuous Quality Improvement review of each DD agency providing SE services.

CRP development will continue to meet the needs of all ORS adult, out-of-school youth and in-school youth eligible for Supported Employment services and expand on CRP access to funding source options such as Ticket to Work, Partnership Plus, and Department of Labor and Training/Governor's Workforce Board through identification of new CRPs and enhancing current CRPs.

## **g. Coordination with Employers**

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

### **1. VR services; and**

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer clients paid, community-based, integrated work experiences consistent with client interests. This service provides a unique opportunity for ORS to assess an individuals' work skills and behaviors within a business environment. The employer provides feedback to the agency and the client about their skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS coordinates with employers and potential hires in On-the-Job Training (OJT) opportunities. An adult Project Search site was developed and implemented at RI Hospital in 2018/2019.

In addition, ORS partners with the business community and a Community Rehabilitation Provider (CRP) to identify the specific training needs of large and growing businesses. ORS continues to partner with RI businesses and CRPs to provide a competitive integrative employment and work experience. One business offers a boot camp model, providing two weeks of classroom work, followed by a third consisting of half of the week in the classroom and half of the week in an employment setting, followed by up to nine weeks of paid work-based training within the actual business facilities. This prepares job candidates for the exact skill set required by the employer, and thus a successful job match. The partnership not only offers community integrated competitive employment opportunities for ORS customers, but it is also producing a qualified and specifically-trained pool of candidates.

The Workforce Development Assistant Administrator and the agency's Employment Cadre has developed over 30 business partners with a myriad of companies in Rhode Island. When provided with job openings from these partners, alerts are forwarded to the 45 counselors who share this information with appropriate job seekers. Once a qualified job seeker has applied and after a confidential release has been obtained, ORS contacts the employer and job develops on the qualified job seeker's behalf. ORS is exploring different business engagement models with WINTAC as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts. The Workforce Development Supervisor also receives daily job postings from the Department of Labor and Training, JobFindha Network, VOCcentral and NET(National Employment Team).

### **COMPREHENSIVE NEEDS ASSESSMENT:**

ORS conducted a state-wide Comprehensive Needs Assessment (CNA) in collaboration with the SRC in 2017. This CNA incorporated a component related to the needs of the

business community in order to create a foundation for developing new and innovative training and services specific to those needs.

**MARKETING/OUTREACH STRATEGY:**

ORS will continue collaboration with its state partners and the SRC to explore development of a marketing plan to target specific business sectors. Collaboration with the Governor's Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education (RIDE), and Rhode Island Department of Labor and Training (DLT) is critical as the state implements the Comprehensive System Change Plan (CSIP).

**2. transition services, including pre-employment transition services, for students and youth with disabilities.**

**PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):**

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector. The State emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search, a nationally recognized program with successful outcomes for persons with I/DD, becoming a reality. The first Miriam Hospital Project Search – started in 2014, was a success, and the program was replicated with Blue Cross in 2015, and an additional site in 2016 at Newport Hospital.

In addition, ORS funds summer work experiences for youth since 2010. ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment programs for work experiences to potentially eligible students with disabilities. All of these work experiences are in integrated community-based work settings at minimum wage or above.

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can report on the overall numbers as identified in census as registered for Pre-ETS. Current ORS census has 1,162 identified Pre-ETS individuals.

## **h. Interagency Cooperation**

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### **1. the State Medicaid plan under title XIX of the Social Security Act;**

ORS has a working relationship with each of the entities referenced in this attachment.

#### **THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT:**

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is administered by the Department of Human Services (DHS). However, the complexities of increased income on other benefits such as the Developmental Disability agency's service cost share, subsidized housing, and food stamps requires considerable coordination among the state agencies. ORS participates on a monthly case coordination team that examines the Sherlock Plan to identify obstacles, increase inter- and intra-agency collaboration, and develop possible solutions.

In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive benefits planning information up through a complete individualized Benefit Analysis by a Benefits Counselor. ORS is working with DHS, Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), Disability Law Center, and Advocates in Action to report on obstacles to individuals, to explore increasing capacity, and to examine how the service can be reimbursed by Medicaid. ORS has collaborated with the Sherlock Center on Disabilities (RI's University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD) program) to ensure that community forums are set up to disseminate benefits counseling information to families, individuals, stakeholders, and transition aged youth as the first step in increasing knowledge of work incentives.

### **2. the State agency responsible for providing services for individuals with developmental disabilities; and**

#### **THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES:**

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with Developmental Disabilities through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental disabilities.



ORS continues to provide Supported Employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities.

ORS sponsors and participates in the Developmental Disabilities Supported Employment Advisory Council and Mental Health Supported Employment Council, for Developmental Disabilities, and has a representative on the Developmental Disabilities Council.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services through the customer-selected CRP. A Performance-Based Supported Employment pilot that began in 2017 ended in mid-2018. The program resulted in about thirty percent placement rate, but the pilot was discontinued as it had no positive effect on increasing CRP staffing.

The objective of the SE services is in integrated competitive employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs - who also rely on BHDDH funding - to provide the long-term supports that help sustain employment for individuals with significant developmental disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

As the funding source, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support. ORS and BHDDH have also enlisted technical assistance providers to explore collaborative funding to maximize SE dollars.

In 2014, the State of RI negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment services in order to work. The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE), and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, both adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully-informed choices about work. The three state agencies are obligated by the DOJ/State Consent Decree to develop Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA. These obligations have been developed and are in place currently,

with quarterly reporting to the DOJ and Court Monitor on data, process, and continuous quality improvement.

### **3. the State agency responsible for providing mental health services.**

#### **THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES:**

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with mental health issues - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH).

ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.

ORS sponsors and participates in the Supported Employment Advisory Council for Behavioral Health. MA level Rehabilitation Counselors function as liaisons to CRPs and agencies that offer SE services to individuals with behavioral health issues.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in integrated competitive employment outcomes. As a leader, trainer, and funding source of supported employment services, ORS engages CRPs who rely on BHDDH funding to provide the long-term supports that help sustain employment for individuals with behavioral health disabilities.

The objective of the SE services is in integrated competitive employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service; however, RSA has established time limits in WIOA for SE services. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer and WIOA standards. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

#### **4. THE STATE AGENCY RESPONSIBLE FOR OPERATION OF ONE STOP CENTERS:**

ORS, as required by WIOA, is a financial and programmatic partner with Rhode Island America's Job Centers (AJCs) formerly the netWORKri One-Stop Centers. ORS Vocational Rehabilitation Counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including consultations, accepting referrals, applications, counseling, information and referral, and placement

services. This is also an opportunity for ORS Vocational Rehabilitation Counselors to re-enforce client awareness of the Career Center as an additional resource for help with employment including Real Jobs RI. ORS personnel provide consultation to the AJC's One-Stop staff on disability issues, accessibility considerations, and assistive technology, and are available for any cross-training opportunities that would apply to VR. ORS will provide One Stop Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to AJC One Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may better educate or equip the AJC staff in order to assist individuals with disabilities.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One-Stop Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence/Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board and a subcommittee for Employment for People with Disabilities that ORS personnel attend, and also participate in annual Request for Proposal reviews.

RI has two Workforce Investment Boards (WIBs). ORS became an active participant in the Disability Committee required by WIOA.

Budgetary issues in 2017 resulted in ORS implementing a change in Order of Selection to a stricter eligibility standard as of December 19, 2017. This resulted in increased collaboration and interaction with AJC One-Stop Centers and DLT programming. This created ample opportunity for strengthening the relationship between DLT, ORS, and BHDDH for common purposes and addressing Consent Decree demands.

**i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development**

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

**1. Data System on Personnel and Personnel Development**

**A. Qualified Personnel Needs.**

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

ORS has sought to recruit and retain qualified staff for all positions within the agency. Such incentives as assistance with CRC maintenance credits and ongoing professional training and support are intended to retain the staff. In addition, ORS has cultivated a relationship with local colleges and universities for Rehabilitation Counselor practicum and internship opportunities.

**QUALIFIED PERSONNEL NEEDS:**

In FFY 2018, ORS provided services to approximately 3,985 individuals, with an average caseload of 92. ORS has a total of 94 full-time equivalent (FTE) positions, which includes 44 MA level Vocational Rehabilitation Counselor positions. When approved ORS has continued to recruit and hire Vocational Rehabilitation Counselor for vacancies when they arise. All new counselors have Master's Degrees in Vocational Rehabilitation Counseling. During FFY 2018 until now, fourteen (14) ORS staff retired or left the agency. leaving vacancies in the following positions: (2) VR Counselor I positions, (3) VR Supervisor positions, (1) VR Administrator, (1) Assistant Administrator/RI Works and Transition, (1) EMC System Administrator, (1) Rehabilitation Counselor, (1) Peripatologist, (1) Social Caseworker II (2) Support Staff, and (1) Case Aide.

In FFY 2019, the following positions are currently vacant after resulting promotions: one (1) VR Supervisor position, (2) two VR Counselor I positions, three (3) VR Counselor II positions, one (1) Case Aide, one (1) Rehabilitation Counselor position, one (1) Peripatologist, one (1) Social Caseworker II position, and two (2) support staff. Over the next 3- to 5-year period, ORS estimates that approximately 10-15 individuals (administrators, supervisors, counselors and support staff) will be eligible for retirement. Given the number of employees that could potentially leave state service, ORS is actively pursuing graduate students for internships with ORS via the Rehabilitation Counseling programs from local universities and colleges.

## **DRAFT - 11/12/19**

Vocational Rehabilitation Counselor I - 29

Vocational Rehabilitation Counselor II - 14

Supervisory - 10

Administrative - 8

Fiscal - 6

Case Aide - 3

Support Staff - 11

Social Services - 7

Direct Services - 5

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Vocational Rehabilitation Counselor I - 2

Vocational Rehabilitation Counselor II – 3

Supervisory - 1

Administrative - 0

Fiscal - 0

Case Aide - 1

Support Staff - 2

Social Services - 2

Direct Services - 1

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Vocational Rehabilitation Counselor I - 3

Vocational Rehabilitation Counselor II - 3

Supervisory - 2

Administrative - 1

Fiscal - 4

Case Aide - 1

Support Staff - 2

Social Services - 2

Direct Services - 1

### **B. Personnel Development**

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

ORS has cultivated a relationship with two area colleges that offer graduate training in Rehabilitation Counseling: Assumption College in Worcester, MA and Salve Regina University in Newport, RI.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

As of 2019, there are 66 students enrolled in the graduate programs (61 at Assumption College and at 5 Salve Regina University) to obtain their MA in Rehabilitation Counseling.

iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Assumption College - 24 Graduates from previous year with a MA in Rehabilitation Counseling

Salve Regina University - 2 Graduates from previous year with a MA in Rehabilitation Counseling

## **2. Plan for Recruitment, Preparation and Retention of Qualified Personnel**

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

ORS has ongoing communication with Assumption College and Salve Regina University to ensure that the present and projected needs of ORS are considered in the program planning. Both offer a MA in Rehabilitation Counseling via a combination of on-campus and distance learning.

## **3. Personnel Standards**

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:



**A. standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and**

**1. ADEQUATELY PREPARED AND TRAINED STAFF**

Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. The Rhode Island Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master's Degree in Rehabilitation Counseling.

All new Vocational Rehabilitation Counselors are required to meet the standard of a Master's Degree in Rehabilitation Counseling from an accredited program.

ORS has been able to meet the CSPD standard of filling all VR Counselor vacancies with individuals with a Master's Degree in Rehabilitation Counseling, and expects to be able to continue to meet this standard.

ORS will continue to offer practicum/internship opportunities for students in MA Rehabilitation Counseling programs, the State Internship program and will continue to work with institutions of higher education to recruit qualified individuals to fill vacancies.

ORS will continue to fill all fiscal, support staff and case aide vacancies with individuals who meet state requirements for education and experience.

ORS will continue to seek Commission on Rehabilitation Counselor (CRC) Certification Approval for training provided by ORS. Currently ORS has 31 VR Counselors, Supervisors, and Administrators who are CRC certified.

**2. ANNUAL PERSONNEL NEEDS ASSESSMENTS**

The 2018 Comprehensive Needs Assessment indicated the following training needs: Workforce Innovation and Opportunity Act, Effective Time Management, and Motivational Interviewing.

The Strategic Planning Coordinator and Training Coordinator of ORS elicited information from staff July of 2019, to establish a list of training topics.

Top areas of training need self-reported by survey respondents included: Business Engagement, Transgender population, Workforce Innovation and Opportunity Act/ Performance Measures, Services for Transition School to Work population, Employee Self-Care and Supervisory Skill development, Behavioral Health and Substance Use, Autism Spectrum Disorder and Clients with a BCI, Job and Task Analysis and Transferable Skills Analysis.

A training schedule is developed based upon the identified needs and will be implemented during FFY 2019 through FFY 2022. ORS anticipates a current focus on Business Engagement, Transgender population, Workforce Innovation and Opportunity Act/ Performance Measures, Services for Transition School to Work population, Employee Self Care and Supervisory Skill Development, Behavioral Health and Substance Use, and Clients with a BCI.

Training will also incorporate 21st century understanding of the evolving labor force and the needs of individuals with disabilities as outlined by WIOA.

Through the State Office of Training and Development agency staff have the opportunity to attend trainings such as: MS Power Point, Advanced Workplace Writing, Effective Writing, Supervisory and Leadership training, etc.

**B. the establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.**

Training opportunities are provided on an ongoing basis to ensure that staff have the most current information on the labor market, best practices, and assistive technology.

Through the Workforce Development System staff can attend training/orientation to WIOA partner resources held at the American Job Centers. ORS has provided information to attendees on Order of Selection, Workplace Accommodations, Assistive Technology etc.

Since December 2009, all ORS Rehabilitation Counselors hired have met the Rhode Island standard (100% compliance) of a Master's level in Vocational Rehabilitation Counseling. All field VR Supervisors and Administrators meet the CSPD standard.

ORS continues to dedicate financial and Training Coordinator time to support the CSPD plan.

ORS continues to structure mentoring activities around specific specialization areas in anticipation of future retirements.

All existing fiscal and support staff meet or exceed state requirements for education and experience.

#### **4. Staff Development.**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

##### **A. System of staff development**

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

ORS recognizes the importance of ensuring that staff have the necessary skills and abilities to provide quality services in a professional and timely manner. Examples of trainings offered/provided include: Ethics in Rehabilitation Counseling, disability specific trainings, Supported Employment, Customized Employment, Relationship

Building with the Business Community, Social Security Administration/Ticket To Work Cost Reimbursement 101, Title II Disability Benefits and Work Incentives, 21st Century Best Practices for Job Development and Placement for VR staff, as well as for VR Vendors, HIPPA, Wellness Training, Small Business Development Overview, WIOA Performance Measures, Fiscal Office of Accounts and Controls, Supervisory Styles and When to Use Them, etc.

Training for all staff of ORS remains a priority. Examples of areas identified for future training include: Marketing of ORS, Medical Marijuana & Other Prescribed Medications: Considerations for Vocational Counseling and Employment, Business Engagement, Ticket to Work, Customized Employment, Supported Employment, disability/population specific trainings, etc. ORS will continue to promote trainings offered through the RI Learning Center which offers a range of training via Academies, Workshops, Tutorials, Webinars, etc.

In order to retain qualified staff and in anticipation of additional staff retirement, ORS has and will continue to offer/promote leadership development training, succession planning, and capacity building opportunities to interested staff.

Management staff continues to include interested personnel in activities such as: assistive technology, transition, training, Community Rehabilitation Program (CRP) development, quality assurance, and strategic planning as a means of expanding agency knowledge base about these content areas.

Eight of the forty-three ORS Vocational Rehabilitation Counselors have been on the job for less than 5 years; thus, necessitating the training on vocational rehabilitation assessment, guidance and counseling, best practices, and ORS policies and procedures.

ORS believes that the next three- to four-year period is a critical time to assist newer counselors and supervisory personnel in professional development and growth to transition into positions of increased responsibility due to anticipated promotions and retirements.

ORS has developed an Employment CADRE, and after several quarters of meetings, decided to split into two separate entities, with one half of the committee performing Business Engagement activities such as Business Ambassadors, advocates, and educators to the business community. The other half of the committee will be responsible for the agency's marketing activities and material. The Employment CADRE members also provided employment and labor information back to their regions at monthly regional meetings.

ORS relies on supervisory observations, quality assurance reviews, and self-identified training needs to enhance professional development.

The Training Coordinator and Strategic Planning Supervisor elicits input from counselors, supervisors, support staff, and administrators regarding their training needs.

If a Corrective Action Plan around personnel performance is necessary, the Corrective Action Plan would be in compliance with the CSPD, ORS regulations & procedures, and union regulations.

ORS will enlist the Employment CADRE and WINTAC to assist with enhancing staff competencies in addressing the needs of business community.

**B. Acquisition and dissemination of significant knowledge**

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

ORS will continue to utilize the Job Driven Vocational Rehabilitation Technical Assistance Center (JD-VRTAC/Workforce Innovation Technical Assistance Center (WINTAC) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocation Rehabilitation services.

ORS has enlisted the Workforce Innovation Technical Assistance Center (WINTAC) to assist ORS in addressing the following WIOA requirements: (1) Effective Implementation of Pre-ETS; (2) Increasing competitive employment outcomes through increased customized or supported employment; (3) Effective transition to the common performance outcome measures; and (4) Develop partnerships to better meet business engagement and employer supports

Distribute articles and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions.

**5. Personnel to Address Individual Communication Needs**

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Interpreters and translators are available to staff to communicate with diverse customer populations, for staff trainings, and supervision. The Electronic Case Management System allows for entry of individual's primary language and preferred communication.

ORS has two Video Relay stations to enable communication in ASL between staff who are Deaf or Hard of Hearing, their colleagues, and customers. ORS utilizes a UBIDuo communication device in order to provide another avenue for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers. The Blind Service region of ORS has staff who routinely employ alternate forms of communication including enhanced print or contrasted print materials, Braille, tactile sign, software and voice over programs for text recognition, in addition to a variety of computer/electronic assistive devices and technologies.

The staff of the Blind Service VR unit of ORS include VR professionals who are themselves blind, as well as those trained in vision rehabilitation teaching and technology, and whom serve as a resource for staff development and training in addition to their direct service responsibilities.

The Deaf and Hard of Hearing Region at ORS has developed and produced an ASL video that explains ORS services and is available on the ORS website.

Access to ORS information and services is provided through the use of the Language Line - The Big Word, interpreters from a variety of resources, and bilingual staff.

ORS brochures, letters, and forms are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

## **6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act**

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual Transition Conference that offers a combination of training, collaboration, and service delivery planning between the VR Counselors assigned to the LEA, teachers, and special education staff.

ORS has about 30 Vocational Rehabilitation Counselors who have Transition responsibilities for providing services to in-school youth with disabilities, technical assistance to school personnel, and outreach to families.

On a monthly basis, the VR Administrator and/or Assistant Administrator for Transition facilitates a meeting with all the counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training, and problem solving. At least annually, RIDE is invited to provide information about current and changing trends, regulations, and practices. VR counselors with Transition responsibilities also attend the quarterly Transition Advisory Meetings conducted by the Regional Transition Coordinators, which is an opportunity for updates on recent changes and cross training in specific areas between special educators, teachers and ORS.

## **STATE REHABILITATION COUNCIL**

Pursuant to the Act, ORS offers to the State Rehabilitation Council (SRC) the opportunity to review and comment on the CSPD. Additionally, members of the State Plan, Quality Assurance Policy Committee met with ORS representatives to provide input into the CSPD.

**j. Statewide Assessment**

**1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:**

**A. with the most significant disabilities, including their need for supported employment services;**

**RESULTS OF COMPREHENSIVE STATEWIDE ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES AND NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS**

The Rehabilitation Act of 1973, as amended, mandates that the Rhode Island Office of Rehabilitation Services (ORS), in partnership with the State Rehabilitation Council (SRC), complete a Statewide Comprehensive Needs Assessment (CNA) at three-year increments. The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Supported Employment, minorities with significant disabilities, underserved individuals, youth with disabilities and individuals with disabilities served by other components of the workforce development network. In addition, the CNA is intended to identify the need to develop or improve Community Rehabilitation Programs (CRPs). ORS views the CNA as a dynamic and evolving process that incorporates information from several diverse sources rather than from any one event or data source.

ORS and the State Rehabilitation Council (SRC) will be initiating a CNA in FFY 2021 for the 2022 State Plan. This assessment will incorporate the new WIOA regulations and focus on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:

- With the most significant disabilities, including their need for supported employment services;
- Who are minorities;
- Who have been unserved or underserved by the VR program;
- Who have been served through other components of the statewide workforce development system; and
- Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

During FFY 2016/17, ORS addressed the Statewide Comprehensive Needs Assessment using several resources including:

- Community Comprehensive Needs Assessment Survey
- Customer Satisfaction Survey
- Environmental Scan of Data including: Comprehensive System Improvement Plan, Department of Labor & Training data, Bureau of Labor Statistics, Disability



employment statistics, US Department of Labor Bureau, US Census Bureau, RI Department of Education and the Office of Disability Employment Policy

- Rhode Island Governor's Commission on Disability Public Forums
- Office of Rehabilitation Services Staff Comprehensive Needs Assessment Survey
- Focus group with key staff informants

The 2017 survey conducted by ORS and the SRC was sent to 492 individuals, which included CRPs, employers, ORS staff and ORS consumers. 155 individuals completed the survey which represents a 31.5% return rate based on the 492. A broader range of the community, along with more individuals, received and answered the surveys, thus providing ORS with more information on the needs of individuals with disabilities.

The CRP survey yielded the following:

- When obtaining employment, social skills, fear of losing Social Security benefits, expectations from family and transportation are the most common challenges faced by individuals with disabilities.
- When maintaining employment, social skills, personal/home life barriers, transportation, expectations from family, fear of losing Social Security benefits and personal expectations are the most common challenges faced by individuals with disabilities.
- When obtaining employment for individuals, job availability, job matching, CRP time & resources, availability of retention & supports, insufficient job search preparation and availability of job development are the most frequent challenges faced by CRP's.
- When maintaining employment for individuals, job matching, CRP time & resources, insufficient job search preparation and availability of job retention & supports are the most frequent challenges faced by CRP's.
- Benefits counseling, long-term supports, case management, job coaching, work trial/internships/situational assessments and on-site job retention support are the most frequent challenges faced by CRP's.
- 58% of CRP respondents hold the credentials to provide supported employment services.

The Employer survey yielded the following:

- Giving individuals a fair chance and helping out the community was the primary motivation in employing people with disabilities.
- Communication and the ability to effectively provide accommodations were the largest challenges faced when hiring a person with a disability.
- Accommodations, reliability, performing the necessary job duties and adaptability were the largest concerns in hiring people with disabilities.
- Joy, helping, watching employee growth and gaining valuable employees were the largest rewards in hiring individuals with disabilities.

Respondents identified the following disabilities as least served by ORS:

## DRAFT - 11/12/19

- Substance Abuse Related Disorders
- Intellectual Developmental Disability
- Behavioral Health

Respondents identified the following ethnic populations as least served by ORS:

- American Indian/Alaska Native
- Pacific Islander/Native Hawaiian
- Asian

Employers and consumers indicated that ORS could:

- Promote awareness of ORS
- Incorporate job postings on the ORS website that matches individuals to well-suited jobs.

### CUSTOMER SATISFACTION SURVEY

In 2019, ORS re-designed the monthly consumer satisfaction surveys, with input from the SRC State Plan, Policy and Quality Assurance sub-committee. The survey, designed as an ongoing tool to be distributed at set intervals, provides longitudinal data on customer satisfaction. Surveys are sent to customers who have open cases with ORS, are in post-employment plan services and employment status. The re-designed surveys assist in capturing WIOA data, were rolled-out in April 2019 and the early data is undergoing initial phases of analysis.

The following conclusions were formulated based on the results of the surveys.

- More networking with employers and knowledge of labor market.
- More training opportunities.
- Strengthening timely communication between themselves and their ORS counselor.
- Physical location of CRP's.

### ENVIRONMENTAL SCAN

The environmental scan included information from a variety of sources such as: Comprehensive System Improvement Plan, RSA data, RI Department of Labor & Training (DLT) and Department of Labor - Bureau of Labor Statistics, Disability Employment Statistics-U.S. Department of Labor's Bureau of Labor Statistics, US Census Bureau, RI Department of Education, and Office of Disability Employment Policy. The sources indicated the following:

- Need for stronger coordination across Government and non-Government entities in the workforce system, including businesses.
- Need for better training opportunities.
- Need for more opportunities for job seekers to gain experience through internships and apprenticeships.

- RI was ranked 29th in the nation for employing people with disabilities; 34.3% of individuals with a disability in RI were employed; 76.3% of individuals without a disability in RI were employed; RI was ranked 36th in the nation in regard to employment gap between individuals with disabilities and individuals without disabilities.
- Since the last CNA, jobs in RI fluctuated: Professional & Business positions increased by 2,900; accommodation & Food Service increased by 1,600; Entertainment & Recreation increased by 200; Information jobs were unchanged; Manufacturing, Retail, Transportation and Educational Service all showed a slight decrease; Government employment decreased by 500; Health Care & Social Assistance decreased by 1,000; Construction decreased by 1,800.
- Nationally: 17% of individuals with disabilities were employed; 64.6% of individuals without a disability were employed; Unemployment rate for individuals with a disability was 12.5%; Unemployment rate for individuals without a disability was 5.9%.
- Disability in the National Workforce: 18.2% worked in the service fields (excluding protective service); 15% worked in Administrative support; 10.4% worked in Sales; 9% worked in Management, Business and Finance.
- According to the RI Department of Education, their five-year strategic plan focuses on the following: increase retention on both students and educators; promote one student to computer training philosophy; expand student access to early college and career education training programs; expand and deepen college and career counseling services, while informing youth and adults into the decision making process; reach out to business and industries to partner with schools in the development and management of career and technical education programs; collaborate with districts, education providers and business providers to offer recognized, career-ready credentials and skills transcripts; reach out to employers and internship providers to partner with school districts to complete employability skills assessments and transcripts.

### VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT

Behavioral Health/Emotional Impairments, Cognitive Impairments, Physical Disabilities, Intellectual/Developmental Disabilities and Substance Abuse disorders comprised the majority of ORS caseloads.

Services for the South East Asian community, Native Americans, and Students with 504 plans ranked as the top opportunities to improve outcomes for underserved groups.

Workforce Innovation & Opportunity Act (WIOA)

Motivational Interviewing.

Effective time management.

Needs of Individuals with Most Significant/Significant Disabilities and Supported Employment Services:

- Increase the capacity and knowledge base of CRPs who provide Supported Employment services
- Improve access to vendors, awareness of cultural issues and distinctions, make services readily available for emerging populations/minorities, as well as access to services for individuals who are not English-speaking.
- Transportation to services that are available
- Increase the capacity of CRPs who work with individuals with Developmental Disabilities to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment
- Need for a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities.
- Need for CRP's to have qualified personnel to provide a continuum of services.

**B. who are minorities;**

**Rehabilitation Needs of Minorities:**

- Enhance the cultural competency of ORS staff and CRPs to specific minority populations within the state
- Incorporate interpretation and communication needs into the IPE Underserved and Unserved Populations
- Engage Southeast Asian, Muslim, Liberian, Cambodian, and African American communities through outreach and marketing strategies
- Incorporate access to services for individuals who are not English-speaking.
- Ensure services are readily available for emerging populations/minorities.

**C. who have been unserved or underserved by the VR program;**

The Comprehensive Needs Assessment (CNA) completed in 2017 identified the following as the most unserved/underserved populations served by the VR program:

- Physical Disabilities
- Intellectual and Development Disabilities
- Behavioral Health
- Mental Health

**D. who have been served through other components of the statewide workforce development system; and**

The Comprehensive Needs Assessment (CNA) conducted in 2017 did not identify unserved populations for that component. However, surveys from ORS staff identified that the following areas needed to improve services:

- Prepare consumers for emerging employment driven by employer needs
- ORS should be an active partner with the DLT and the employment community to promote access to employment for individuals with disabilities
- There is difficulty in gaining access to the statewide workforce development system

- High level of difficulty in knowing which programs and services are best for consumers

**E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.**

The 2017 Comprehensive Needs Assessment (CNA) identified that students with 504 plans are underserved.

There were 8,400 in RI with IEP's. This number could include students in a school setting, individuals who are home-schooled, individuals in other types of non-traditional school settings, etc.

“At-risk” students with learning disabilities do not want to be identified as having a disability; and therefore, are not potentially accessing services.

Students indicated a positive experience with ORS, and that the referral process was seamless.

Students (and their parents) indicated they are unaware of the full scope of services available to them, and had difficulty understanding written materials provided by ORS.

**2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and**

Need to further remove the following barriers in order to strengthen the quality of services from CRPs:

- Transportation barriers, maintaining staff, access to benefits counseling and community-based job availability were challenges to delivering services and employment outcome
- Fear of losing Social Security benefits, medical coverage, family expectations, individual expectations, home life and lack of social skills are the most common personal barriers for individuals with disabilities who are seeking employment.
- Need for providers to have qualified personnel to provide a continuum of services, along with the need to increase service provider capacity.
- Assess CRPs' ability to work with varying populations and disabilities.

Meeting the needs of the Business Community:

- Increase marketing and awareness of ORS services.
- Enhance presence at business expos and job fairs
- Provide Business Community with information on ADA and work place accommodations

**3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the**

**extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act .**

Develop materials about ORS that are easier to comprehend for both students and parents

Consider strategies on how to better connect to “at-risk” students outside of the schools, as students report feeling stigmatized

Expand outreach to other programs, such as youth centers, family resource centers, and career & education programs

Strengthen connections to higher education, particularly disability support service coordinators, to increase access to underserved youth and students with disabilities

Assist schools in increasing communication and coordination for “at-risk” youth and students with disabilities

ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual Transition Conference that offers a combination of training, collaboration and service delivery planning between the VR counselors assigned to the LEA, teachers and special education staff.

Monthly, the VR Administrator and/or Assistant Administrator for Transition facilitates a meeting with all VR counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training and problem solving. No less than annually, RIDE is invited to provide information on regulations, practices and trends.

ORS has roughly 30 VR counselors who have a responsibility to provide Transition services to youth with disabilities, technical assistance to school personnel and outreach to families.



**k. Annual Estimates**

Describe:

**1. The number of individuals in the State who are eligible for services;**

For FFY 2020, ORS has a goal of 1,179 new applicants and expects 1,214 individuals to become eligible. ORS anticipates that 268 new Individualized Plans for Employment will be developed, and 540 successful outcomes achieved. As of July of FFY 2019 ORS has 595 new applicants and has determined 510 individuals eligible. New Individual Plans for Employment have been developed with 135 and 325 individuals have been closed successfully.

For FFY 2021, ORS has a goal of 1,180 new applicants, with 1,215 individuals to become eligible for ORS services. ORS anticipates that 269 individuals will develop Individualized Plans for Employment, and projects 541 successful outcomes.

In FFY 2022, ORS projects 1,181 new applicants, with 1,216 individuals to become eligible for ORS services. ORS anticipates that 270 individuals will develop Individualized Plans for Employment, and projects 542 successful outcomes.

**2. The number of eligible individuals who will receive services under:**

**A. The VR Program;**

**NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY**

As of 12/19/17 all OOS Categories I, II, and III were closed. As money and staff resources become available, individuals will be taken from the Category I Waitlist by date of application. In FFY 2018 ORS received additional Federal and State funding which allowed for 25 Priority Category I individuals to be moved in November 2018 off the Waitlist into services. ORS will continue to monitor fiscal and staff resources with a goal of continuing to move 25 clients per month off the Wait List.

OOS Category I - 2,016

OOS Category II - 3

OOS Category III - 0

Maintain Employment - 0

Total - 2,019

**B. The Supported Employment Program; and**

In FFY 2020, the projected number of Title VI to be served under an IPE is 430

**C. each priority category, if under an order of selection;**

OOS Category I - Title VI: 430

OOS Category II - Title VI: 0

OOS Category III - Title I: 0

ORS will take individuals off the Category I wait list as funds are available for services by date of application and will continue to assign to the wait list eligible clients who meet criteria for Category II or Category III, however ORS does not anticipate opening the waitlist for any category during FFY 2020 through FFY 2022.

For FFY 2020 through FFY 2022, ORS will serve individuals with the most significant disabilities Priority Category 1 first and individuals with a significant disability Priority Category 2 second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category 3.

**3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and**

As of 7/23/19 the OOS Waitlist is 812. Of this number, 556 are OOS Category I, 222 are OOS Category II, and 34 are OOS Category III. Each month, ORS averages 40 Category I admissions and 10 Category II admissions and 2 Category III admissions, so 52 clients will be admitted to the Waitlist for each month of FFY 2020. For FFY2021, it is anticipated that by 10/30/20, 496 clients will be on the Waitlist. In FFY 2018 ORS received additional Federal and State funding which allowed in November of 2018 for ORS to begin moving monthly 25 Priority Category I individuals off the Waitlist into services. ORS will monitor funding and staff resources quarterly for availability to move clients in Category I off the Waitlist based on date of application.

**4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.**

For FFY2021, OOS Category I - Title I: \$2,653,903 based on following calculation:

$\$1,249.48 \times 2,124 = \$2,653,903$

## **I. State Goals and Priorities**

The designated State unit must:

### **1. Identify if the goals and priorities were jointly developed**

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, regulations, and planning activities are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with federal Performance Measures as stated in WIOA, monitoring reviews, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

### **2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.**

**ALL OF THE FOLLOWING GOALS ARE FOR PY2020 and PY2021**

#### **GOAL 1: TO INCREASE INTEGRATED COMPETITIVE EMPLOYMENT OPPORTUNITIES FOR ORS CUSTOMERS COMPARED TO TOTAL SUCCESSFUL EMPLOYMENT CLOSURES FROM PREVIOUS YEAR.**

**OBJECTIVE 1:** Partner with an additional two to three sector businesses to address personnel recruitment and training needs

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist trainers to build and implement a training curriculum
- Pilot, modify, and replicate

**OBJECTIVE 2:** Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses

- Establish a system to disseminate information to VR Counselors
- Encourage WIOA partners to include a requirement in RFPs that targets individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)
- Explore opportunities with all State Partners for collaborative funding models for service delivery.
- Explore options under Science, Technology, Engineering and Math (STEM) for business sectors.

**OBJECTIVE 3:** Develop, implement, and replicate the successful business partnerships already operating

- Implement and coordinate Project Search sites already in process and new one in development for adults with IDD. Utilize Viability, a current ORS vendor, to coordinate the two Business/ORS training-employer partnerships.
- Partner with an emerging, high wage business sector
- Increase business engagement activities by VR counseling staff

**GOAL 2: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.**

**OBJECTIVE 1:** Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

- In-School Youth with Disabilities: enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS has initiated a pilot to 10 middle schools to introduce Pre-ETS services to students and is planning on expanding that to more LEAs.
- Adults with Disabilities: ensure a wide array of service providers and training programs enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are identified.

**OBJECTIVE 2:** Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

- Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS and BHDDH will monitor Quality Improvement Plans generated by QI visits on a quarterly basis and will provide documentation to DOJ court monitor.
- Implement training opportunities for SE vendors in assessment, job development, and coaching.
- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.

- Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services
- Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.

**OBJECTIVE 3:** Ensure vendor competence for provision of vocational services and training program that result in competitive integrated employment outcomes.

- Replicate the Continuous Quality Improvement (CQI) process for training for rehabilitation services vendors.
- Develop and implement training opportunities for SE vendors in assessment, job development, and job coaching.
- Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
- Offer RFPs that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

**GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.**

**OBJECTIVE 1:** Meet WIOA performance accountability measures

- Participate on the WIOA Interagency Workgroup
- Determine the “what and how” of contributing ORS data to state reporting requirements
- Continue to educate staff to the new data elements that are required and need to be maintained, be timely, and accurate
- Obtain guidance from RSA to establish specific numerical targets
- Determine how to collect baseline data on performance measures
- Participate in Technical Assistance opportunities on capturing performance measures

**OBJECTIVE 2:** Meet RSA requirements for eligibility and plan development

- Determine eligibility within 60 days of application
- Develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination
- Utilize MIS to track adherence to these standards on a quarterly basis

**OBJECTIVE 3:** Monitoring Wait List

- Provide weekly updates to Administration, BHDDH, and Executive Office of Health and Human Services (EOHSS) to identify Wait List number broken down by Category and Consent Decree population
- Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization
- Maintain and update ORS website to report on number of individuals currently on Wait List
- Develop process for fiscal forecasting monitoring
- Identify other WIOA partners and resources for persons applying for services and placed on Wait List
- Continue to monitor Wait List on a quarterly basis

**OBJECTIVE 4:** Provide agency staff with up to date tools and technology that enhance delivery of services to customers and capture reportable data

- Provide Staff Training and support as the agency transitions from System7 to InFormed Electronic Case Management/MIS System
- Develop a wage interface tool with Libera to capture WIOA Post Exit wage data
- Utilize the Work # available through DHS to capture WIOA Post Exit wage data for cases not available in the RI UI data base
- Work with the Governor's Workforce Board to enable ORS designation as a Performance Accountability and Customer Information Agency (PACIA) with the State Wage Information System (SWIS)

**3. Ensure that the goals and priorities are based on an analysis of the following areas:**

Goals and priorities established were based on results of FFY 2017 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from RI Department of Education (RIDE), employers, CRPs, ORS staff, and clients through client surveys.

**A. The most recent comprehensive statewide assessment, including any updates;**

Goals and priorities established were based on results of FFY 2017 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from RI Department of Education (RIDE), employers, CRPs, ORS staff, and clients through client surveys. The next Comprehensive Needs Assessment will be for FFY 2021

**B. the State's performance under the performance accountability measures of section 116 of WIOA; and**

ORS and the SRC identified (Goal 3) that ORS will need to develop data collection and reporting methods that meet the new WIOA performance measures and RSA standards of practice. ORS is currently building the baseline for new WIOA performance measures. In order to meet this goal, ORS plans to continue to participate on the WIOA Interagency Workgroup, to determine the "what and how" of contributing ORS data to state reporting requirements, to educate staff to the new data elements that are required and need to be

maintained, to obtain guidance from RSA to establish specific numerical targets, to determine how to collect baseline data on performance measures and to enlist Technical Assistance opportunities on capturing performance measures.

**C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.**

Results of 2017 RSA Monitoring Site Visit are still pending.



## **m. Order of Selection**

Describe:

### **1. Whether the designated State unit will implement an order of selection. If so, describe:**

#### **A. The order to be followed in selecting eligible individuals to be provided VR services.**

**Order of Selection Description:** The Rehabilitation Act, as amended, requires that an Order of Selection for Services be instituted any time that limited resources impede the agency from providing services to all eligible consumers. The Office of Rehabilitation Services (ORS) implemented an Order of Selection within its VR program in 2010. Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A): ...the term "individual with a significant disability" means an individual with a disability -(i) who has a severe physical or mental impairment which seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;(ii) whose vocational rehabilitation can be expected to require multiple services over an extended period of time; and(iii) who has one or more physical or mental disabilities resulting from [list] ... or another disability ... to cause comparable substantial functional limitations.

**First priority** will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability if a mental or physical impairment exists that seriously limits four or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

**Second priority** will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits two or three functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

**Third priority** will be given to other eligible consumers who have a disability that seriously limits one functional capacity in terms of an employment outcome and requires two or more services over an extended period of time.

**Extended period of time:** Six months or more.

**Multiple services:** Requiring two or more primary services.

ORS began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I and will continue to assign to the Wait List eligible clients who meet criteria for Category II or Category III.

For FFY 2021 through FFY2022, ORS will serve individuals with the most significant disabilities Priority Category I first and individuals with a significant disability Priority

Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

**B. The justification for the order.**

In FFY 2010 due to retirements, budget constraints, promotions, sick leaves and workforce reductions, ORS implemented an Order of Selection that involved prioritizing services to Category I individuals with the most significant disabilities. All Category II and Category III individuals were placed on a Wait List for services. When resources have become available, Category II eligible clients have been moved off the Wait List. It was anticipated, at the time, that this restriction would continue through FFY2019.

At the conclusion of FFY 2017, ORS was confronted with additional budget constraints, increased costs of services and agency obligations to comply with a Department of Justice Consent Decree. ORS requested \$5,000,000 in re-allotment VR funds and received \$532,198, as a portion of the funds was used to assist hurricane-affected states. The culmination of these factors is impeding the agency's ability to provide services to all eligible individuals with the most significant disabilities, thus necessitating closure of all categories in the Order of Selection.

During FFY 2018/2019 ORS continued to face the concerns noted at the end of FFY 2017, which necessitated continued closure of all categories in the Order of Selection. In FFY 2019, the agency requested \$5,000,000 in re-allotment funds and received \$1,150,157. While funding constraints remain a concern, the additional funding enabled ORS to begin taking 25 individuals assigned to Priority Category I, off the Wait List the first of every month, as of November 2018, based on date of application. As resources allow, ORS will continue this practice on the first of every month.

The Order of Selection does not discriminate against any person by type of disability, economic status, race, color, national origin, disability, political beliefs, sexual orientation, age, religion, sex, or protected class.

**C. The service and outcome goals.**

Projections for numbers to be served in FFY 2021 through FFY 2022 are based on the current census. These numbers reflect those currently being served or projected to be served as resources allow, and ORSs ability monthly to continue to move 25-50 individuals assigned to Priority Category I off the Wait List. ORS will remove additional people based on additional funds becoming available. a. All categories will remain closed; thus, the numbers below do not reflect any individuals who are determined eligible and placed on a wait list after all categories are closed, or clients who have been found eligible, but have not begun to receive services under an IPE.

Order of Selection (OOS):

OOS Category I: 2016

OOS Category II: 3

Maintain Employment Clients: 0

The goal for all the customers referenced by the Order of Selection categories is an employment outcome. This employment outcome reflects the individual's informed career choice that has evolved from information about skills, interests, preferences, abilities and the labor market. The Individualized Plan for Employment (IPE) is then developed to reflect that choice and the specific services/interventions needed by the individual to reach that employment outcome. It is anticipated that multiple services will be necessary over an extended period of time in order for the individual to reach their employment goal.

**D. The time within which these goals may be achieved for individuals in each priority category within the order.**

Quantifying the length of time an individual is active with ORS is difficult as the necessary services, duration, and outcome is individualized to the needs of each customer. Projections based on recent performance:

Priority Category I - 36 Months

Priority Category II - 13 Months

Maintain Employment Clients- N/A

**E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and**

ORS assures that its Order of Selection (OOS) policy gives first priority to individuals with the most significant disabilities, Priority Category I. Services are delivered within a comprehensive, coordinated program that is designed to assist these individuals to prepare for and engage in gainful employment in an integrated setting. Beginning 12/19/17, ORS closed all categories and will take individuals off the Category I Wait List as funds are available for services by date of application. ORS does not anticipate opening the Wait List for any category during FFY 2021/FFY 2022.

In FFY 2018, ORS discontinued the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services and who are currently employed and at risk of job loss due their disability and who could benefit from VR services to maintain employment. ORS believes consumers who are on the wait list and in Category I need to be the top priority. ORS will revisit this through an amendment if additional funding becomes available and ORS is able to open Category I.

ORS notifies all individuals who do not meet the current Order of Selection and provides information and referral services. These alternative resources are intended to assist in obtaining employment and related services through such Workforce Development resources as the American Job Centers. Individuals are re-assessed when additional information about their functional limitations is received, following the OOS classification decision.

One exemption to placement on the Wait List follows:

Pre-Employment Transition Services (Pre-ETS): These ORS services are provided to students with disabilities in collaboration with each Local Education Authority (LEA) or

other school program. Students receiving Pre-ETS prior to application and/or eligibility determination may continue to receive Pre-ETS services. Conversely, students determined eligible prior to beginning Pre-ETS services, will not receive them until they are taken off the wait list according to the priority category assigned. These Pre-Employment Transition Services, which fall under the regulations implementing the 2014 Workforce Investment Opportunities Act (WIOA) amendments to the Rehabilitation Act of 1973 to help prepare students for employment after high school. The Office of Rehabilitation Services strives to assist all students with significant disabilities who choose to work, gain the necessary skills, preparation, exploration and supports to enter the workforce.

**2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment**

No. ORS and the SRC continue to have discussions at the SRC meetings regarding Order of Selection changes, impact and implementation. The SRC has offered feedback, guidance and support throughout the process with the goal of ensuring transparency to individuals seeking VR services and educating the Community Rehabilitation Programs.

ORS began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I and will continue to assign to the Wait List, eligible clients who meet criteria for Category II or Category III.

For FFY 2021 through FFY2022, ORS will serve individuals with the most significant disabilities Priority Category I first, and individuals with a significant disability Priority Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

**n. Goals and Plans for Distribution of title VI Funds.**

**1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.**

**STATE'S GOALS AND PLANS FOR TITLE VI FUNDS**

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities for FFY 2021-FFY 2022 are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with RSA practice standards, as stated in WIOA, monitoring reviews, the Department of Justice (DOJ) State Consent Decree and Interim Settlement Agreement, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

**ALL OF THE FOLLOWING GOALS ARE FOR FFY 2021 - FFY 2022 TITLE VI**

**GOAL 1: TO INCREASE INTEGRATED COMPETITIVE SUPPORTED EMPLOYMENT OUTCOMES FOR ORS CUSTOMERS WITH THE MOST SIGNIFICANT DISABILITIES COMPARED TO SUCCESSFUL SUPPORTED EMPLOYMENT OUTCOMES FROM PREVIOUS YEAR.**

**OBJECTIVE 1:** Partner with two to three sector businesses to address personnel recruitment and training needs.

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist trainers to build and implement a training curriculum
- Pilot, modify, and replicate

**OBJECTIVE 2:** Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses

- Establish a system to disseminate information to VR Counselors
- Utilize internal group, Employment Cadre, to work on business engagement, marketing, and increasing business contacts
- Develop a spread sheet available to ORS staff, listing all employers who are currently engaged & invested in working with ORS consumers for employment outcomes
- Encourage WIOA partners to include a requirement in RFPs that targets individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)

**OBJECTIVE 3:** Develop, implement, and replicate the successful business partnerships already operating

- Expand Project Search, targeting in-school youth and adults with the most significant disabilities, from four to five sites
- Enlist GWB, BHDDH and several current ORS vendors, to develop an interagency, cross-disability employment initiative with additional Business/ORS training-employer partnerships
- Develop regionalized employment centers from that initiative

**GOAL 2: TO PROVIDE A FLEXIBLE SUPPORTED EMPLOYMENT SERVICE DELIVERY SYSTEM, BASED ON EMPLOYMENT FIRST PRINCIPLES AND PRACTICES THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY INCREASED COMPETITIVE EMPLOYMENT OUTCOMES.**

**OBJECTIVE 1:** Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

- Students with Disabilities: enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. Expand pilot of Pre-ETS services for 10 middle schools State-wide.
- Adults and Youth with Disabilities: ensure a wide array of service providers and training programs to enable customers to obtain meaningful, quality employment as rapidly as possible, considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are identified.

**OBJECTIVE 2:** Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

- Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis.
- Implement training opportunities for SE vendors in assessment, job development, and job coaching.
- Participate in regular meetings with SE vendors and BHDDH staff to reinforce and strengthen Employment First principles and practices.
- Support and participate in the SE Developmental Disability (DD) and SE Behavioral Health (BH) vendor meetings.

- Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services
- Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.
- Explore a customized employment pilot on a fee for service basis with CRPs interested in providing it.
- Provide training and support to enhance business engagement activities.

**OBJECTIVE 3:** Utilizing Employment First principles/Let's Get to Work, coordinate and initiate a Statewide expansion of the culture of employment for persons with disabilities.

- Continue to collaborate with Governor's Workforce Board (GWB), Department of Labor and Training (DLT), Behavior Health Developmental Disabilities and Hospitals (BHDDH) and Sherlock Center on Disabilities to build upon business engagement, identifying and remediating barriers to employment and developing strategies for possible regionalized job development.
- Utilize ORS and BHDDH prospective technical assistance providers (SELN and WINTAC) to explore how to develop a marketing plan that targets outreach to employers and increased business engagement.
- Support and participate in the development of a "roadmap" to access employment services and benefits counseling for distribution to entrance points i.e. hospitals, rehabilitation centers, etc.
- Encourage and support SE CRPs/proposed employment collaboratives to become Social Security Ticket to Work Employment Networks (EN) and engage in Partnership Plus option with ORS.
- Explore with State parties' models of braided, blended and pooled funding.

**OBJECTIVE 4:** Ensure vendor competence for provision of vocational services and training program that result in integrated competitive employment outcomes.

- Replicate the Continuous Quality Improvement (CQI) process for training for rehabilitation services vendors.
- Develop and implement training opportunities for SE vendors in assessment, job development, job coaching and business engagement.
- Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
- Offer opportunities that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

**GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA**



**STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING STANDARDS**

**OBJECTIVE 1:** Meet WIOA performance accountability measures.

- Participate on the WIOA Interagency Workgroup
- Determine the “what and how” of contributing ORS data to state reporting requirements and cooperating with State-wide partners of data sharing agreements.
- Continue to educate staff to the new data elements that are required and need to be maintained, be timely, and accurate.
- Obtain guidance from RSA to establish specific numerical targets.
- Determine how to collect baseline data on performance measures.
- Continue to participate in Technical Assistance opportunities on capturing performance measures.

**OBJECTIVE 2:** Meet RSA requirements for eligibility and plan development.

- Determine eligibility within 60 days of application.
- Develop the Individualized Plan for Employment within 90 days of eligibility determination.
- Utilize MIS to track adherence to these standards on a monthly basis.
- Ensure that counselors are utilizing appropriate waivers for eligibility and plan development.
- Ensure that client’s vocational goals are consistent with other state partners BHDDH vocational goals.

**OBJECTIVE 3:** Monitoring Wait List

- Continue to provide weekly updates to Administration and Office of Health and Human Services to identify wait list number broken down by Category and Consent Decree population.
- Continue to provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization.
- Maintain and update ORS website to report on number of individuals currently on Waitlist
- Monitor fiscal forecasting to determine when to move individuals off the Waitlist.
- Identify other WIOA partners and resources for persons applying for services and placed on waitlist.

**OBJECTIVE 4:** Provide agency staff with up to date tools and technology that enhance delivery of services to customers and capture reportable data

- Provide Staff Training and support as the agency transitions from System7 to InFormed Electronic Case Management/MIS System
- Develop a wage interface tool with Libera to capture WIOA Post Exit wage data

- Utilize the Work # available through DHS to capture WIOA Post Exit wage data for cases not available in the RI UI data base
- Work with the Governor's Workforce Board to enable ORS designation as a Performance Accountability and Customer Information Agency (PACIA) with the State Wage Information System (SWIS)

**2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:**

**A. the provision of extended services for a period not to exceed 4 years; and**

WIOA obligates ORS to set aside 50% of the Title VI grant for youth with the most significant disabilities age 14-24. ORS anticipates that each population of youth will need different SE services and approaches to engage, explore, and prepare for employment.

Students with disabilities in need of SE Services:

- Enhance the Transition program and service options within each high school to coordinate and deliver Transition that provide services and work experiences to youth and students with disabilities in order to reach a competitive integrated employment outcome.
- Implement Project Search, targeting in-school youth and students with disabilities with the most significant disabilities, at three sites.
- Increase the number of Summer Work experiences.
- Refine the Job Exploration service to utilize discovery principles and career exploration opportunities.
- Develop the capacity and process for providing Job Coach supports for community-based work experiences.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis.

Youth Out-of-School in need of SE Services:

- Engage Department of Labor and Training (DLT) Youth Centers, One-Stop Centers, Adult Education Programs, Mental Health agencies, and DD Agencies to identify out-of-school youth in need of SE services.
- Build SE agency capacity to provide a continuum of services.
- Facilitate referrals to Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH) of youth in need of SE services so that long term supports can be available to sustain employment.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis.

**B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.**

Enlist Rhode Island Department of Education (RIDE), BHDDH, Department of Human Services (DHS), and ORS to ensure collaborative funding methods support the provision of SE services as part of Transition and Pre-ETS.

Establish increased knowledge about each state agency's responsibility for funding, adults and youth, SE services in collaboration with each state partner, and the SE vendor community.

Maximize existing youth resources, such as DLT Youth Centers.

## **o. State's Strategies**

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

### **1. The methods to be used to expand and improve services to individuals with disabilities.**

PY 2020 and PY 2021 goals and priorities established by ORS and the SRC as articulated in State Goals and Priorities and in State Goals and Plans for Title VI Funds will be realized through the following strategies:

#### **METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES:**

ORS plans to expand and improve services through: (1) improved relationships with the business community, (2) staff training focused on client preparation for an employment outcome, (3) increased marketing and accessibility of information about the agency; (4) analysis of internal processes and methods to improve operational systems and overall services to clients; and (5) Continuous Quality Improvement Activities.

The overall purpose of ORS, as reinforced by WIOA and the RI Governor's Workforce Board (GWB) system-change initiatives, is to increase the competitive employment opportunities for individuals with disabilities through partnerships with and responsiveness to the needs of the business community. Efforts over the next several years will include continued collaboration with other state agencies to develop a coordinated approach to implementing a business needs and customer driven service delivery system, as described in the GWB's Comprehensive System Improvement Plan (CSIP). This revised service-delivery system is to be based on the identified personnel needs of the business community and the identified training and job preparation needs of the ORS customer.

- ORS will enlist its partners to identify local businesses to develop targeted training programs to meet the specific needs of local business sectors.
- ORS will continue to participate on the Governors Workforce Board (GWB), Workforce Investment Boards (WIBs), WIOA Interagency Workgroup, and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS continues to advocate for the Vocational Rehabilitation needs of individuals with disabilities as the state re-aligns its workforce development resources.
- ORS will explore with BHDDH and DLT the creation of regionalized job development collaboratives.
- ORS will look at best practice models used in other states for blended and pooled funding.
- ORS will build on current initiatives with DLT and GWB

- ORS will encourage WIOA partners to include an RFP requirement that targets individuals with disabilities.
- ORS will continue to grow its business partnership utilizing previous successful models with other area businesses.

The Comprehensive Needs Assessment (CNA), required of the SRC and ORS at three-year increments, will incorporate the findings of the CSIP and identify additional assessment areas.

- ORS staff training focused on workforce development principles will enable Vocational Rehabilitation Counselors to use their knowledge and training about disabilities, functional limitations, and competitive employment to develop plans with clients that include not only acquisition of technical knowledge through training but also development of the work behaviors critical to employment success.
- Increased use of vocational guidance and counseling, provided by ORS staff, will be essential to help clients prepare for the demands of employment. In addition, incorporating work experiences into employment plan development will increase the client's ability to make informed choices about career selection and provide the ORS Counselor a feedback opportunity about work behaviors.
- Participation in employment experiences for individuals needing Supported Employment, in-school youth, and clients attending college/training programs funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE).
- ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage.
- ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery Principles and Practices into service delivery in order to increase expectations that individuals with significant intellectual and behavioral health disabilities can obtain quality employment outcomes in integrated settings at competitive wages.
- ORS will provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to customers and their families, CRPs, support staff, and ORS staff in order to support informed choice and employment decisions.
- ORS will continue to update its web-page to ensure that information about the agency is current and relevant to the WIOA and state priorities around workforce development.
- Links to partners and examples of partnerships will be helpful to market the services of ORS to potential clients, businesses, and other agencies. ORS will continue to expand communication through social media outlets, to include Facebook, Twitter, and YouTube, among others. In addition, orientation groups, literature distribution about the agency, presence at the America's Job Centers (netWORKri One-Stop Centers,) and participation in resource education events around the state will enhance referrals and visibility.

- The ORS Continuous Quality Improvement (CQI) committee will continue to monitor the CQI plan to ensure a continuous QI system for monitoring, evaluating, and providing timely information for staff and administration about the agency's progress in meeting the goals outlined in the State plan. Monitoring via monthly reports to ORS Administration and staff about status of performance measures will occur.
- ORS will continue to elicit feedback from customers through satisfaction surveys and follow up through ongoing case reviews.
- ORS will continue to provide outreach to customers on waitlist.

The DOJ/State Consent Decree requires a CQI process and review be implemented to ensure quality services are provided to Supported Employment clients. ORS will continue to refine, pilot, and modify the process for CQI review of CRPs. The first line of reviews will be completed in early 2020, with the next round facilitated by BHDDH licensing and QI team, with ORS input. The DOJ Consent Decree CQI efforts continue to be a strong point of emphasis.

## **2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.**

### **PROVISION OF A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.**

ORS utilizes a broad range of assistive technology services, such as the ATAP Partners that are funded through State Grants for Assistive Technology, ORS Assistive Technology fee-for- services, and purchasing devices through approved vendors. Assistive Technology needs are person-centered and, on a case-by-case basis.

ORS utilizes the ATAP Partnership for demonstration, information and assistance, device reutilization, and device loan to explore if assistive technology would be appropriate for acquisition to assist individuals with disabilities in the rehabilitation process. Device Loan can also be utilized for vocational assessment, as well as the bridge from one device to acquiring another.

ORS has vendor-approved services through fee-for-services to provide detailed assistive technology services, such as assistive technology assessment, assistive technology installation and repair, assistive technology training, worksite assessment, and device acquisition.

ORS staff are expected to incorporate access to and acquisition of assistive technology, evaluations, assessment, and training as core services for adults, students, and youth with disabilities. The Deaf & Hard of Hearing unit and Services for the Blind and Visually Impaired (SBVI) unit are especially knowledgeable about assistive technology. Services for the Blind and Visually Impaired rehabilitation teachers review assistive technology needs of individuals with visual impairments or legal blindness. ORS also houses the ATEL program that operates an assistive technology lab for individuals who are Deaf or

Hard of Hearing and/or have other speech and neurological impairments to have the opportunity to trial assistive technology equipment.

The provisions above continue to assist in making informed choices about equipment, and for using try-outs prior to making appropriate purchasing decisions. ORS has been mindful of working with individuals that are multi-layered in their needs for assistive technology and continues to work with both fee-for-service vendors and ATAP Partners in identifying the needs of individuals with disabilities.

**3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.**

ORS monitors outcome ratios for minority populations in order to identify the current level of service, the need for expanded or new CRP services, and potential emerging minority populations.

Review and analyze needs of minority and underserved populations, in order to develop capacity and expand CRP network ability to competently provide services that result in increased quality employment outcomes.

ORS ensures all agency materials, including those found on the ORS website and available for informational sessions, are provided in Spanish (or other languages), or alternate formats, as needed.

Establish new and innovative strategies to maintain ORS involvement with in-school youth with disabilities, adults, and youth who are no longer in school.

Staff attend in-service trainings on cultural sensitivity and competence, including instruction on use of interpreters; etc.

Formulate strategies to maintain communication and services with minority and underserved populations from application through service delivery to a quality employment outcome.

ORS identified needs of minority population and developed new bi-lingual services to include driving evaluations, occupational therapist training, and clinical/learning disabilities assessments.

**4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).**

A Cooperative Agreement (CA) between RIDE and ORS, an RSA Best Practice, has been the foundation of a robust collaborative relationship focused on school-to-work transition for almost twenty years. Incorporated into the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services not subject



to Order of Selection (OOS) will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. Transition and Pre-ETS focuses on employment-related information and services to in-school youth with significant disabilities, including those students with an IEP or 504 plans. In addition, the State of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ)/State Consent Decree/Interim Settlement Agreement to in-school youth identified as having a significant intellectual disability (I/DD).

Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, and accept referrals. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. A referral system is in place for students with disabilities, and each fall ORS, in collaboration with the Regional Educational Collaboratives and BHDDH, provides an orientation to Special Education staff at each Rhode Island High School. Transition and Pre-ETS services include: Counseling & Guidance, Job Explorations, and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any work activities already completed by the LEA such as volunteer positions, work tryouts, and internships provide valuable information to the discussion and planning process. These activities are considered trial-work experiences by the DoJ, so are important to vocational planning.

Transition and Pre-ETS incorporates services for the DOJ/State Consent Decree identified youth with significant intellectual disabilities, as well as for all in-school youth potentially eligible for ORS. In addition, the DOJ/State Consent Decree requires each high school to develop Career Development Plans (CDP) with all in-school youth with I/DD beginning at age fourteen and reviewed annually. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities for in-school youth may include such services as: Job Explorations, and Assessments; Community-Based Work Experiences; Participation in Transition Academies; Summer Work Experiences for In-School youth (Employment Alliance - an extended school year paid work experience supported by ORS and an LEA as well as the four-week paid work experience funded by ORS to an ORS approved provider); Project Search, and a pilot of a summer internship program specifically designed for young adults in 2 year and 4 year degree programs. In 2018/2019, ORS developed a pilot to expand the provision of Pre-ETS to students in 10 middle schools, with hopes of expanding the pilot Statewide in 2020/2021.

## **5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.**

The Assistant Administrator for Vendor Affairs/Workforce Development continues to hold regular meetings with Supported Employment, General, and Transition vendors to address concerns specific to their services and to reinforce their role within the Workforce Development community of RI. These meetings also provide an opportunity

to clarify agency expectations, new service delivery ideas, and funding issues. Also, meetings are being scheduled with specific high-volume vendors and staff to address agency specific issues as they arise and to cultivate increased communication and partnership. Through his participation on the ORS Continuous Quality Improvement Team, the agency has developed a Quality Assurance program initially for Supported Employment providers.

The Continuous Quality Improvement Committee works to develop increased options for individuals with disabilities who are considered underserved and/or minority populations based on the CNA findings. In addition, ongoing Quality Improvement activities such as the quarterly satisfaction survey are developed and implemented by the SRC State Plan and Continuous Quality Improvement Committee. These studies, organized by the ORS Strategic Planning Supervisor, provides ongoing information that is relevant to customers' vocational rehabilitation needs and planning.

The Rhode Island Office of Rehabilitation Services (ORS) will continue to modify a fee-for-service structure with a wide network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of Rhode Islanders with disabilities utilizing the information from the FFY 2017 Statewide Comprehensive Needs Assessment (CNA).

## **6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.**

ORS is participating on the WIOA Interagency Workgroup. The Committee is examining methods to gather and track employment outcomes, educational, and skill advancement, as well as expenditures. ORS is working with the MIS system to be able to capture all required WIOA data elements and employment information to be reported quarterly on open and closed cases.

In addition, monthly monitoring of timeline requirements to determine eligibility and IPE development are in place. Each staff member has annual performance targets for the number of new applications, and successful employment outcomes. RSA had a monitoring visit with ORS in 2018, and ORS is awaiting the final report. ORS is still working to gather baseline performance information that will provide the basis for improvement strategies moving forward.

ORS will continue to seek guidance from the RSA and WINTAC to establish WIOA performance measures.

## **7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.**

ORS is in a unique position to assist other components of the Workforce Development system to provide services to individuals with disabilities. The ORS Assistant Administrator of Vendor Affairs/Workforce Development interacts with the business community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Women's Business Enterprise (WBE), and Minority Business Enterprise (MBE) trade organizations. The Department of Human Services (DHS) will be represented on each of the two existing Workforce Investment Boards (WIB) covering

Providence/Cranston and Greater RI areas and their Youth Sub-committee. ORS staff review RFPs of Rhode Island's two Workforce Investment Boards, Youth Councils, and Youth Centers; and advocates strategies for the inclusion of youth with disabilities in the Governor's Workforce Investment initiatives.

ORS, through its parent agency, Rhode Island Department of Human Services, and as required by WIOA, is a financial and programmatic partner with Rhode Island America's Job Centers (AJCs). ORS counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston AJCs.

ORS personnel provide consultation and training to the AJC staff on disability issues, accessibility considerations, and assistive technology. ORS will provide AJC Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to AJC Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of AJC Staff.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the AJC Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend and participate in annual Request for Proposal reviews.

ORS provides leadership and consultation to enhance the vendor community to becoming more integrated into the workforce development system. Providing case-specific consultation, as well as education about business practices, employment outcomes, and accountability, has become a focus of the dialogue between ORS and its approved vendors.

ORS will define how ORS, Adult Education, and Department of Labor and Training will be collaborating on adult education and apprenticeship programs through technical assistance from RSA on this topic.

## **8. How the agency's strategies will be used to:**

### **A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;**

The goal and objectives outlined by ORS to increase competitive employment opportunities for ORS customers and to provide a flexible service-delivery system that prepares customers for employment align with the 2017 Comprehensive Needs Assessment (CNA). Information for strategic planning was gathered through 2017 CNA activities, meetings with the seven field services regions, and Quality Improvement Activities.

ORS will continue to assess information as it becomes available and to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan.

ORS will coordinate joint training opportunities for CRPs and ORS personnel, maximize ORS' collaboration with the AJC Centers, Youth Centers, and business community, and promote CRP capability in the provision of a continuum of employment services.

ORS will encourage assessment activities and plan development that promotes informed choice, self-determination, and case movement toward integrated competitive employment, enhance Supported Employment services with emphasis in integrated and competitive goals, maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits), emphasize outreach strategies that target underserved and unserved disability and minority populations, and address the needs of specific businesses and coordinate staff resources to work in collaboration with the SRC sub-committees as warranted example, QI/State Plan.

**B. support innovation and expansion activities; and**

ORS will utilize Innovation and Expansion (I & E) funds during FFY 2020 to support the activities of the SRC. The SRC and ORS will conduct a state-wide Comprehensive Needs Assessment, as required by RSA in FFY 2020. The results of this CNA will establish the Goals and Priorities for the Vocational Rehabilitation and Supported Employment services under WIOA. This CNA will incorporate existing reports from the Governor's Workforce Board, the results of the Governor's Commission on Disabilities, as well as DLT reports to frame and structure the CNA.

ORS will utilize I&E funds to develop innovative training and placement services that are responsive to the needs and preferences of the business community and ORS clients. Expansion of such efforts as Project Search, business-based training, Chamber of Commerce events, Let's Get to Work Initiative, NCIS training, customized employment training, and OJT will be explored. Partnerships with DLT and other state agencies to develop a coordinated response that maximizes collaborative funding will be encouraged.

ORS will use I&E funds to cultivate new CRPs and innovative service-delivery models to meet the diverse rehabilitation, support, training, and employment needs of underserved populations: minority populations, individuals with significant intellectual disabilities, TANF populations, individuals with Asperger's and Autism, and individuals with sensory impairments.

**C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.**

ORS will increase the number of minority and underserved populations who participate in services and who obtain integrated competitive employment outcomes by cultivating CRPs to meet the needs identified in the CNA.

ORS will review and utilize the GWB Comprehensive System Improvement Plan (CSIP) to assess service delivery within the State and development of employment services for ORS customers.

## **DRAFT - 11/12/19**

ORS will enlist the resources of interpreters, and ensure forms and information is accessible. Orientation groups are provided for potential applications to attend and apply for services, this includes an orientation group monthly with Hispanic bilingual staff.

ORS maintains the ability to access information and the application for services on our website.

Vocational Rehabilitation Counselors are assigned to schools and other community agencies as liaisons to facilitate access to ORS services.

ORS continues to identify needs of minority population and develop new bi-lingual services to include driving evaluations, occupational therapist training, and clinical/learning disabilities assessments.

**p. Evaluation and Reports of Progress: VR and Supported Employment Goals**

Describe:

**1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:**

**A. Identify the strategies that contributed to the achievement of the goals.**

**STATE PLAN FOR VR TITLE I FFY 2018/PY 2017 AND FFY2019/PY 2018:**

The State Plan for FFY 2018/PY 2017 and FFY 2019/PY 2018 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the Department of Justice (DOJ) Consent Decree (CD) in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

**Accomplishments:**

Several new initiatives, fee-structure adjustments, Adult Project Search, Pre-ETS services expanded to ten (10) middle schools LEA's, and expanded training programs had been developed in response to the data analysis, Comprehensive Needs Assessment (CNA), and feedback from customers, vendors, and staff.

ORS continues to utilize a monthly mechanism for alerting staff and supervisors about the status of admissions eligibility determination within 60 days and IPE Development within 90 days for Adult and Transition customers. Our move to a tighter OOS and eligibility process has caused some concerns about continuing to meet 60-day eligibility and 90-day plan development requirements. In our RSA monitoring visit, we were informed that ORS VR counselors should be utilizing extension waivers for IPE development as well as eligibility. ORS worked with the electronic case management system vendor to ensure that the IPE letters were available to staff.

Several of the other initiatives included: development and continuation of four Project Search sites in collaboration with four local businesses, Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Department of Labor and Training (DLT), and Local Education Authorities (LEAs); development of partnerships with local businesses to provide on-site training and resultant employment for ORS customers; and development of a summer work experience specific to the career goals of customers attending college. ORS expanded Business Engagement Outreach practices.

ORS also increased collaborative efforts with BHDDH and DLT (through the Governor's Workforce Board) to develop training and employment programming for individuals with intellectual and developmental disabilities (IDD) to increase vocational opportunities to meet CD goals.

Starting November 1, 2018, ORS began releasing individuals from Wait List based on application date.

ORS expanded CRP vendor services to minority/underserved population.

**ACTUAL EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:**

ORS reporting of employment outcomes had been done based on FFY. As of this State plan, ORS has made the transition to reporting outcomes based on PY to better align with WIOA performance measure and RSA-911 data reporting. Additionally, this shift has allowed the agency to place more of an emphasis on quality outcomes versus number of outcomes.

PY 2017

Successful Closures 559

Successful Transition Closures 82

Successful Minority and Underserved was 102

PY 2018

Successful Closures 425

Successful Transition Closures 95

Successful Minority and Underserved 147

**B. Describe the factors that impeded the achievement of the goals and priorities.**

Obstacles for FFY 2018 and FFY 2019 for Title I, VR, include the focus on in-school youth and Pre-ETS service delivery, and adult mandates from DOJ Consent Decree, which has compromised the agency's focus on other transition and adult populations. Also, a decrease in ORS's request for re-allotment funds from RSA in 2017 resulted in moving to a tighter OOS eligibility process and closure of all categories.

Several staff retirements at ORS have resulted in loss of knowledge with replacement staff having to learn while transitioning positions.

Change in OOS categories and Wait List resulted in less fee-for-service funding and a decrease of vendor capacity. That decrease has resulted in an unstable staffing pattern at those agencies, which in turn created a decrease in service delivery of quality services.

**2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:**

**A. Identify the strategies that contributed to the achievement of the goals.**

**STATE PLAN FOR SE Title VI FFY 2018 / PY 2017 and FFY 2019/PY 2018:**



The State Plan for FFY 2018 and FFY 2019 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the DOJ Consent Decree in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

### **GOAL 1: TO INCREASE INTEGRATED COMPETITIVE EMPLOYMENT OPPORTUNITIES FOR ORS CUSTOMERS COMPARED TO TOTAL SUCCESSFUL EMPLOYMENT CLOSURES FROM PREVIOUS YEAR.**

**OBJECTIVE 1:** Partner with two to three sector businesses to address personnel recruitment and training needs

- ORS brought in an out-of-state vendor that specializes in developing relationships and trainings for area businesses in order to meet their specific work needs.
- ORS utilized current Project Search model/template for students to develop and implement an adult Project Search site, targeting individuals with IDD via a collaboration with BHDDH and DLT Real Jobs RI initiative. The site is RI Hospital, as part of the Lifespan Network. The first cohort was successfully completed in June 2019, and a second cohort will commence in October 2019.
- ORS collaborated with BHDDH on a CVS Customer Service Training with several cohorts in progress.

**OBJECTIVE 2:** Utilize participation on Governors Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses:

- ORS continues to have a consistent presence on the Governors Workforce Board, WIOA Interagency Workgroup, and other advisory groups.
- ORS has an internal Employment Cadre consisting of VR Counselors, headed by the Assistant Administrator of Vendor Affairs/Workforce Development, to address employment and job development needs of the agency as a whole. In 2019, the Cadre made the decision to split into two subcommittees, one to address Business Engagement efforts, and one to address marketing VR services, especially to employers.
- ORS maintains a daily presence at the America's Job Centers One-Stops, which provides the foundation for a cohesive service delivery system to ORS customers. ORS has identified staff liaisons to the various advisory groups. ORS is available to AJC staff for cross-training, consultation, and discussion about resources available to individuals with disabilities.
- The ORS Assistant Administrator of Vendor Affairs/Workforce Development disseminates job leads from businesses looking for applicants, and VR Staff also disseminate job leads and participant training opportunities from LinkedIn and Skills for RI.

**OBJECTIVE 3:** Develop, implement, and replicate the successful business partnerships already operating:

- ORS Vocational Rehabilitation Counselors continue to collaborate and facilitate transition services for their assigned LEAs via Rhode Island College Transition Institute.
- Project Search expanded from three to four sites, with the continued goal to expand to five sites. ORS has a total of four sites presently, Miriam Hospital, Blue Cross Blue Shield RI, Newport Hospital (all transition,) and RI Hospital (adult). ORS continues to enlist Viability, a current ORS vendor, to develop an additional Business/ORS training-employer partnership and a pilot for Pre-ETS.
- ORS has and will continue to explore partnering with emerging high wage business sectors.

**GOAL 2: TO PROVIDE A FLEXIBLE SE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.**

**OBJECTIVE 1:** Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into integrated competitive employment.

In-School Youth with Disabilities:

- ORS has a VR Counselor assigned to every high school and developed and enhanced the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. Fact sheets and FAQs pertaining to Pre-ETS were disseminated at Transition Nights, Individualized Employment Plan (IEP) meetings, Career Development Plan (CDP) meetings, and State Agency “Introduction to State Services” meeting with every high school.
- ORS completed a CNA in 2017 and identified trends and needs for Transition-Aged Youth and Adults, such as student and family awareness of the scope of services about the transition-to-adult services.
- In 2019, ORS began a fee-for-service pilot to introduce work exploration services at ten middle schools. This pilot was created to implement the services at year 1, train school staff in year 2, and fade out in year 3, targeting students with disabilities and tracking specific demographic information. ORS hopes to expand this State-wide in 2020 via same fee-for-service process.

Adults with Disabilities:

- ORS ensured a wide array of service providers and training programs enabled customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- ORS completed a CNA in 2017 and identified trends and needs of Adults, and identified areas of need, such as services for individuals with Autism/Asperger’s to design programs and services.

- ORS created and developed two Asperger's programs for soft skills and employment skills as a result of CNA.

**OBJECTIVE 2:** Change the culture of Supported Employment (SE) vendors to expect that integrated competitive employment is the goal from services.

- ORS developed and implemented a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS has evaluated twenty-two providers presently and will continue to collaborate with BHDDH to review one agency per month until first round is completed. ORS will collaborate with BHDDH on follow up CQI review after that first round is completed.
- ORS implemented training opportunities for SE vendors in assessment, task analysis, job development, job coaching, and customized employment.
- ORS has identified training needs for providers, as a result of CQI reviews, such as fading strategies and identifying employment goals.
- ORS will participate in a statewide collaboration with DLT, BHDDH, RIDE and Salve Regina University to hire more people with disabilities.
- ORS continued to collaborate with BHDDH on regular meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- ORS continued to support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings on a monthly basis to identify obstacles and training needs.
- ORS continued to examine and modify, as needed, the VR fee structure to ensure it rewarded integrated employment outcomes.
- ORS ended a pilot with seven Developmental Disability providers for a performance-based supported employment program with focus on employment and increased staff capacity. While the pilot resulted in a 25% successful employment rate, the CRPs did not increase staff capacity. The pilot competed with a similar performance-based funding program initiated by BHDDH: "Person Centered Supported Employment Program (PCSEP.)"
- ORS worked with WINTAC and BHDDH to implement a collaborative funding training to help DD agencies maximize SE funding from both agencies.
- ORS began collaboration in January 2019 with several State Agencies, including with Governor's Workforce Board (GWB), Department of Labor and Training (DLT), Behavior Health Developmental Disabilities and Hospitals (BHDDH) and Sherlock Center on Disabilities to coordinate and initiate a Statewide expansion of the culture of employment for persons with disabilities. ("Employment First")
- The State agencies held a public roll out in January 2019 to announce a comprehensive outreach marketing campaign to support "Employment First"
- Public forums were held to gather information from all sectors to identify specific area to focus energies on, as well as to involve people with disabilities (Advocates in Action and Cross Disability Coalition).
- ORS has enlisted WINTAC TA to explore how best to implement the creation of regionalized job development collaboratives while bringing BHDDH and DLT to the table

**OBJECTIVE 3:** Ensure vendor competence for provision of vocational services and training programs that result in integrated competitive employment outcomes.

- The model developed from Developmental Disabilities provider QI reviews can be replicated for reviews with other service providers.
- As part of CQI reviews, ORS researched and evaluated specific services and correlation with employment outcomes. As part of reviews, ORS tracks the placements and services as part of the report which leads to a joint QI Plan with provider.
- As part of the Consent Decree, ORS collaborated with other State Agencies, as part of the State Training Committee, focused on approving curricula for training to DD providers. This purpose for this training was to increase skill level and knowledge base of provider staff supporting individuals with disabilities.

**GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.**

**OBJECTIVE 1:** Meet WIOA performance accountability measures:

- ORS maintains a consistent presence on the WIOA Interagency Workgroup. Partners have focused on their readiness to capture the new WIOA requirements, therefore discussions have been ongoing among the WIOA partners in the state as to what data and how the data will be reported to state partners.
- ORS has been working with Libera on the agency electronic case management system to collect WIOA performance measures as defined by RSA in July 2017.
- ORS has held several large staff trainings focused on the WIOA reporting requirements. Supervisory training has been provided on the new requirements and entry into the ECM system, guidance documents have been developed, revised as needed and disseminated to staff. Training will continue to be provided to line staff and others as needs arise.
- ORS continues to utilize technical assistance opportunities provided through WINTAC and U.S. Department of Labor WorkforceGPS. ORS will benefit from ongoing technical assistance and guidance from WINTAC, WorkforceGPS, and RSA will be critical to ORS's further understanding the establishment of the performance measure targets.

**OBJECTIVE 2:** Meet RSA requirements for eligibility and plan development:

- ORS still tracks and monitors monthly the 60-day eligibility and 90-day to individualized plan for employment compliance. Regional Supervisors review this data with counselors to determine obstacles towards compliance.

## Accomplishments:

- The DOJ/State Consent Decree with the state of RI created a state-wide commitment to Employment First principles in planning and service delivery for in-school youth and adult with significant intellectual disabilities. ORS has had a long-standing commitment to Integrated Competitive Employment for all individuals with disabilities. However, continued financial support by other state agencies of sheltered workshops impeded resources being re-directed to employment and long-term supports. The DOJ/State Consent Decree mandate forced a realignment of service delivery, funding, and collaboration among state agencies.
- ORS developed and implemented a pilot in 2017 with seven Developmental Disabilities providers for a performance-based supported employment program with focus on employment and increased staff capacity. The pilot ended in 2018 and though the successful employment rate was over 25%, the DD agencies that participated did not increase their staff capacity.
- ORS also developed two separate programs targeting persons with Asperger's with an eye on employment and social skills development. The two programs began as pilots in 2017 and have moved onto regular service delivery menu. This model will be explored in East Bay region with hopes of piloting in 2019/2010.
- ORS also has expanded its Pre-ETS programming and service delivery, and created new innovative summer work experiences, work-based learning opportunities, and educated staff, schools, and families about options.
- ORS piloted a middle school Pre-ETS fee for service program with 10 LEAs in 2019, with hopes of expanding the programming State-wide in 2010.

## **OBJECTIVE 3:** Monitoring Wait List

- Provide weekly updates to Administration, BHDDH, and Executive Office of Health and Human Services (EOHSS) to identify Wait List number broken down by Category and Consent Decree population
- Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization
- Maintain and update ORS website to report on number of individuals currently on Wait List
- Develop process for fiscal forecasting monitoring
- Identify other WIOA partners and resources for persons applying for services and placed on Wait List
- Continue to monitor Wait List on a quarterly basis

**STATE PLAN FOR Title VI FFY 2018/PY 2017 and FFY 2019/PY 2018:**

**ACTUAL SUPPORTED EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:**

**PY17**

**Successful Supported Employment Closures - 133**

**Successful Supported Employment Closures Minority and Underserved - 29**

**PY18**

**Successful Supported Employment Closures - 107**

**Successful Supported Employment Closures Minority and Underserved - 16**

**B. Describe the factors that impeded the achievement of the goals and priorities.**

Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems, and change models to meet goals and priorities.

The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.

ORS' own budgetary constraints have led to a significant change in Order of Selection categorization, and moved more towards placement on Wait List.

**STATE PLAN FOR SE Title VI FFY 2018 and FFY 2019:**

Obstacles:

- The obstacles for Title VI program for FFY 2018 and FFY 2019 occur as the focus and resources of Supported Employment has been on individuals with significant intellectual disabilities, employment, and long-term supports for individuals with other behavioral health (BH) issues has seen a decrease in funding, CRP, and supported employment resources. As a consequence, ORS has struggled to provide SE services to individuals with behavioral health issues, as CRPs are not providing vocational services and long-term supports. Although the state agency responsible for BH services has created a new expectation of MH Centers to address employment issues, the infrastructure for these services will require time to re-build.
- Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems and change models to meet goals and priorities.
- The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.
- ORS' own budgetary constraints have led to a significant change in Order of Selection categorization and moved more towards placement on Wait List.

**3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.**

The WIOA performance accountability indicators are a new requirement for ORS. The agency began tracking the performance accountability data elements via the Electronic Case Management system 7/1/17. ORS anticipates its data collection of WIOA performance accountability indicators to continue to evolve as the agency staff become more familiar with the data elements reported in the RSA911, RSA Dashboards, and ECM system. ORS has enlisted WINTAC to assist with TA in this area.

**WIOA Performance Measures**

PY17 and PY18

Employment Rate 2<sup>nd</sup> Quarter after Exit - PY17 = 263 PY18 = 635

Employment Rate 4<sup>th</sup> Quarter after Exit – PY17 = Not Available PY18 = 376

Median Earning in 2<sup>nd</sup> Quarter after Exit – PY17 = \$3218.50 PY18 = \$3358.39

Median Hourly Earnings at time of exit = PY17 - \$10.25 PY18 - \$11.00

Credential Attainment

Measurable Skills Gains PY17 – 23.8% per Statewide Performance Report Title IV VR

Effectiveness in Serving Employers Performance Measure 6 The State of RI chose to measure:

Retention with the same employer 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit – PY17 = Not Available PY18 = 257

Employer Penetration Rate – ORS provides a PY report to DLT the lead State WIOA partner.

Employer Service	PY17	PY18
Employer Information and Support Services	3	4
Accessing Untapped Labor Pools	6	6
Training Services/Including OJT	3	1

Other

Median Hours per week at time of exit - PY 17 = 24 PY18 = 24

Median Hours per week at time of exit for Supported Employment - PY 17 – 16 PY18 – 15

Median Wage per week at time of exit for Supported Employment – PY17 - \$10.00  
PY 18 - \$10.30



Equal Access to Services: Utilizing the historic Performance Indicator 2.1 of a standard of .80% ORS exceeded the rate with .94% in FFY 2017, .90 in FFY 2018.

In FFY 2018 there were 1069 new applications for services; 283 IPE's developed and 464 employment outcomes. Additionally, 657 individuals were made eligible and placed on the Wait List and 177 youth non applicant entered PRE-ETS services.

In FFY 2019 there were 589 new applications for services; 134 IPE's developed and 323 employment outcomes. 500 individuals were determined eligible and added to the wait list and 445 youth non applicant entered PRE-ETS services.

Evaluation Standard 2 - Equal Access to Services:

Equal Access to Services: Utilizing the historic Performance Indicator 2.1 of a standard of .80% ORS exceeded the rate with .94% in FFY 2017, .90 in FFY 2018

**4. How the funds reserved for innovation and expansion (I&E) activities were utilized.**

ORS used I & E funds to support the Adult Project Search program.

ORS utilized I & E funds to support the contract with the Paul V. Sherlock Center on Disabilities

## **q. Quality, Scope, and Extent of Supported Employment Services.**

Include the following:

### **1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.**

#### **OVERVIEW OF SUPPORTED EMPLOYMENT SERVICES:**

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide Supported Employment services, requirements of WIOA, RSA, and the RI Department of Justice/State Consent Decree (DOJ/CD), as a means to enable individuals with the most significant disabilities to have access to the supports needed to participate in integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils for Developmental Disabilities and Behavioral Health, representation on the Developmental Disabilities (DD) Council, and the RI Transition Council.

ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. ORS is committed to providing and improving Supported Employment services to ORS customers. For those customers who meet the supported employment criteria, the Individualized Plan for Employment (IPE) becomes the foundation for meeting customers' individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support/vendor who will continue to provide support services to the individual with disability on a long-term basis. These long-term support providers are identified in a signed agreement of understanding, which is signed by the vendor agency and ORS.

#### **SUPPORTED EMPLOYMENT SERVICE DELIVERY:**

ORS has employment services that are available to adults, youth, and students with disabilities found eligible for Supported Employment Services. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a state of RI DOJ/State Consent Decree. The Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, resulted in a Governor's proclamation declaring that RI is an Employment First state. The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth.

The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, adults and youth, have access to the services and supports that lead to integrated competitive employment opportunities as the first and desired outcome of state funded services. Provider staff resources were therefore unavailable to support integrated competitive employment

efforts for adults, youth, and students with significant behavioral health and developmental disabilities. ORS and BHDDH, two of the parties of the DOJ/State Consent Decree are mandated to create a state-wide Supported Employment service-delivery system that ensures adults and youth with I/DD are afforded full access to Supported Employment services and long-term supports to maintain employment. There has been a significant increase in collaboration among the State Agencies and the provider network on how best to develop this systems' change.

The three state entities continue to utilize a Transition timeline for staff, families, and school personnel to clarify each agency's obligations to implement the DOJ/State Consent Decree requirements for in-school youths' access to employment exploration and work experiences. An annual "Introduction to State Services" meeting with each high school, continues to be held.

ORS recently extended a Cooperative Agreement with RIDE and is in process of working on a new one. ORS has maintained a very robust presence at each high school in the state to assist with and provide transition-related services for over 17 years. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement to in-school youth with disabilities, including youth with I/DD. The array of Transition Services and Pre-Employment Transition Services (Pre-ETS) services for in-school youth with disabilities include: Job Explorations and Assessments; Community-Based Work Experiences, participation in Transition Academies and ORS/LEA Summer Employment experiences, Summer Work, Project Search, and other Pre-ETS transition and work activities. The array of ORS transition services in place for both students and youth with disabilities and those youth eligible for Supported Employment services meet the requirements of WIOA and the DOJ/State Consent Decree.

#### **SUPPORTED EMPLOYMENT AGENCY NETWORK:**

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with developmental disabilities and behavioral health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental and behavioral disabilities.

ORS has a referral, liaison, and consultative relationship with the CRPs. ORS funds a continuum of Supported Employment services through the customer selected CRP. The objective of the SE services is an integrated competitive employment outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs who also rely on BHDDH funding to provide the long-term supports that help sustain employment. Long-term supports are planned for and included in the customer's ORS Individualized Plan for Employment (IPE). These plans are individualized and define the

scope and specific Supported Employment service. WIOA/RSA funding for SE services is limited by several considerations: (1) to individuals with disabilities found eligible for SE Services and a limitation of extended services to 24 months for adults and 48 months for youth with disabilities. The IPE also identifies the CRP that is accepting responsibility for long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the time restrictions of ORS (as per RSA) and the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

Due to the complexities of implementation of the DOJ/State Consent Decree, ORS attends a quarterly meeting with all of the I/DD Supported Employment CRP. Those meetings focus on service delivery, a target of 20 hours/week as an expectation of employment goal and offer support and guidance to the providers.

ORS took the lead to ensure that staff have the expertise appropriate for the vocational services being provided to individuals with disabilities. ORS has been working with the Sherlock Center for Disabilities and VocWorks in order to identify, develop, plan, and execute training for employees of ORS-approved provider networks. Attending to the training needs of CRPs is an ongoing commitment. The Assistant Administrators for CRPs and Supported Employment actively meet with providers/vendors who provide Supported Employment (SE) services in order to re-enforce the philosophy of Employment First. The two Assistant Administrators, in collaboration with field supervisors, counselors, and ORS administrators, are actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor for ORS in order to increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and questions as well as clarify the elements of a quality employment outcome. ORS participates on the two Supported Employment Advisory Councils as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities.

ORS will continue to encourage CRPs to collaborate with each other, through regular meetings sponsored by either BHDDH or ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its' supported employment population. The fee for service model continues to be updated and modified to cover needs of the SE customer.

## **2. The timing of transition to extended services.**

ORS, as a partner and funding source of Supported Employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with

significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability and Hospitals (BHDDH), are planned for and included in the ORS customers' Individualized Plan for Employment (IPE). The IPE is based on the needs of the customer and define the scope, specific services, and duration of ORS-funded SE services. ORS, according to RSA and WIOA, limits extended SE funding to 24 months for adults and 48 months for youth with disabilities age 14-24 with the most significant disabilities.

The IPE also identifies that the CRP that accepts responsibility for providing the long-term and intermittent support services, funded by BHDDH, in order to maintain employment. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual. The transitioning of a customer from the support services provided by both ORS and the CRP to the extended supports provided solely by the CRP is defined by RSA.